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*City of*  
**Patterson**

# General Plan



## Environmental Impact Report



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## INTRODUCTION

The City of Patterson *General Plan* is the result of over four years of work by a multi-disciplinary consultant team, City staff, the Patterson Planning Commission, and the Patterson City Council. This *Environmental Impact Report (EIR)* documents the environmental considerations incorporated into the process of preparing the *General Plan* and evaluates the environmental effects and implications of the plan.

Preparation of a draft and final environmental impact report is mandated by the California Environmental Quality Act (CEQA). Detailed requirements concerning both content and process are set forth in the California Administrative Code, Title 14, Chapter 3: *Guidelines for Implementation of the California Environmental Quality Act* (hereinafter referred to as *State CEQA Guidelines*).

The *State CEQA Guidelines* provides the following general directions concerning the coordination of planning and environmental impact assessment:

### **§15080. General.**

To the extent possible, the EIR process should be combined with the existing planning, review, and project approval process used by each public agency.

The *State CEQA Guidelines* provide for combining the EIR with the general plan as follows:

### **§15166. EIR as Part of a General Plan.**

(a) The requirements for preparing an EIR on a local general plan, element, or amendment thereof will be satisfied by using the general plan, or element document, as the EIR and no separate EIR will be required, if:

- (1) the general plan addresses all the points required to be in an EIR by Article 9 of these Guidelines; and
- (2) the document contains a special section or a cover sheet identifying where the general plan document addresses each of the points required.

In accordance with these two sections of the *State CEQA Guidelines*, and in an effort to minimize repetition of information, four separate General Plan documents are being used to satisfy the requirements for an EIR. These are: 1) the *General Plan Policy Document*; 2) the *General Plan Background Report*, which describes existing conditions and trends in Patterson; 3) the *General Plan Issues and Options Report*, which was prepared prior to the *General Plan Policy Document* and describes planning issues and policy, program, and land use options; and 4) this *Environmental Impact Report*, which assesses the environmental effects of the *General Plan*. Together, these four documents address all the issues required to be addressed in an EIR. Appendix A describes where all the issues required in an EIR are addressed in the various *General Plan* documents.



## PURPOSES OF CEQA AND EIRS

The purposes of CEQA (and thus EIRs) are summarized in Article 1 of the *State CEQA Guidelines*. Article 1 reads, in part, as follows:

### §15002. General Concepts.

(a) Basic Purposes of CEQA. The basic purposes of CEQA are to:

- (1) Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- (2) Identify ways that environmental damage can be avoided or significantly reduced.
- (3) Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- (4) Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Subsection (f) of this section summarizes the purpose and content of an EIR:

(f) Environmental Impact Reports and Negative Declarations. An environmental impact report (EIR) is the public document used by the governmental agency to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid the possible environmental damage.

- (1) An EIR is prepared when the public agency finds substantial evidence that the project may have a significant effect on the environment. (See §15064(a)(1).)

Subsection (g) summarizes the concept of "significant effect":

(g) Significant Effect on the Environment. A significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project. (See §15382). Further, when an EIR identifies a significant effect, the government agency approving the project must make findings on whether the adverse environmental effects have been substantially reduced or if not, why not. (See §15091.)

The express purpose of an EIR is further elaborated in Section 15121:

### §15121. Informational Document.

- (a) An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to



the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.

- (b) While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15091 and, if necessary, by making a statement of overriding considerations under Section 15093.
- (c) The information in an EIR may constitute substantial evidence in the record to support the agency's action on the project if its decision is later challenged in court.

## TYPES OF EIRS

The precise format for the EIR is not dictated by CEQA or the *State CEQA Guidelines*, but is left to the discretion of the lead agency preparing the EIR. Several types of EIRs or alternatives for formatting EIRs are described in the *State CEQA Guidelines*. Of particular relevance to a general plan EIR are Program EIRs and Master Environmental Assessments (MEAs).

The *State CEQA Guidelines* describes a Program EIR as follows:

### §15168. Program EIR.

- (a) General. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:
  - (1) Geographically,
  - (2) As logical parts in the chain of contemplated actions,
  - (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
  - (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The *State CEQA Guidelines* describes a Master Environmental Assessment as follows:

### §15169. Master Environmental Assessment.

- (a) General. A public agency may prepare a Master Environment Assessment, inventory, or data base for all, or a portion of, the territory subject to its control in order to provide information which may be used or referenced in EIRs or Negative Declarations. Neither the content, the format, nor the procedures to be used to develop a Master Environmental Assessment are prescribed by these Guidelines. The descriptions contained in this section are advisory. A

Master Environmental Assessment is suggested solely as an approach to identify and organize environmental information for a region or area of the state.

The chief advantage of Program EIRs and MEAs is that they can be used to streamline CEQA compliance for a broad range of subsequent projects. Program EIRs or MEAs can be used as the basis for preparing initial studies on individual projects; they can be used as the basis for issuing negative declarations on individual projects; and they can be referenced in subsequent EIRs to address major and cumulative impacts of projects, allowing project-level EIRs to focus on more site-specific impacts. Preparing a Program EIR or MEA does not obviate the need for environmental analysis on individual projects, but it can expedite and simplify subsequent environmental reviews under CEQA.

For these reasons, this EIR has been organized and is intended to be used as both a Program EIR and a Master Environmental Assessment.

## ORGANIZATION OF THIS DOCUMENT

The main body of this *Environmental Impact Report* is divided into nine chapters, each discussing a different set of environmental considerations. These nine chapters are organized as follows:

**Chapter I** describes the process used to prepare the *General Plan*, outlines the key features of the *General Plan*, and summarizes the environmental effects of the draft plan.

**Chapter II** summarizes the assumptions used in developing the buildout calculations upon which much of the rest of the assessment is based.

**Chapter III** evaluates the land use, housing and population implications of the plan.

**Chapter IV** assesses transportation impacts.

**Chapter V** reviews public facility and service impacts.

**Chapter VI** assesses the plan's impact on recreational and cultural resources.

**Chapter VII** examines the plan's impacts on natural resources.

**Chapter VIII** reviews health and safety implications of the plan.

**Chapter IX** addresses mandatory EIR sections, including alternatives, short-term versus long-term uses, significant irreversible effects, growth-inducing impacts, and cumulative impacts.

**Appendices:** Several technical appendices include materials which are essential to the full understanding of the EIR.

For each subject addressed in Chapters III through VIII, the discussion is broken into the following four parts:

1. **Implications of the General Plan Land Use Diagram:** This discussion contains a brief summary of the conditions which would result from development of the land uses shown on the *General Plan Land Use Diagram* without consideration of the policies and programs included in the *General Plan Policy Document*. This section also discusses the assumptions and methodology used to identify implications and to assess impacts.
2. **General Plan Policy Response:** This section outlines policies from the *General Plan Policy Document* which address the subject being discussed. While this discussion focuses primarily on policies which respond directly to the potential negative implications of the *Draft Land Use Diagram*, it also in some cases identifies policies which are not simply mitigative in nature, but are designed to ultimately result in beneficial impacts.
3. **Impacts:** This section describes any negative environmental impacts of the *Draft Land Use Diagram* which would remain unresolved or potentially unresolved by the policies contained in the *Draft Policy Document*. This discussion includes an assessment of the severity of the impact, including a conclusion as to whether the impacts are considered significant according to *CEQA*. The impacts are characterized as "significant," "potentially significant," "less-than-significant," or "not significant for purposes of *CEQA*."
4. **Mitigation Measures:** This section identifies mitigation measures that could lessen or eliminate negative impacts identified as "significant" or "potentially significant" according to *CEQA* standards, or, in some cases, to provide additional mitigation for impacts that are considered "less-than-significant."





## CHAPTER I

### PROJECT DESCRIPTION AND IMPACT SUMMARY

#### A. INTRODUCTION

This chapter describes the process used to prepare the *General Plan*, outlines the key features of the *General Plan*, and summarizes the environmental effects of the draft plan.

#### B. THE GENERAL PLAN PREPARATION PROCESS

This *EIR* assesses the environmental impacts of a comprehensive update of the City of Patterson's general plan. Patterson's former *General Plan* was adopted in 1978, with a revision of the *Housing Element* completed in 1985. Prompted by growth pressures and concern over the future direction of Patterson, the City initiated a comprehensive revision of its *General Plan* in 1988. Upon its adoption, this plan replaces the 1978 *General Plan* as the official guide for development in Patterson.

The City's General Plan Program was initiated in January 1988 when the City retained a multi-disciplinary consulting team headed by J. Laurence Mintier & Associates to assist the City in its general plan effort. The first step in the process was preparation of a *Community Concerns Summary Report* based on a townhall meeting in April 1988, a series of interviews with City officials, and responses to a widely distributed survey form.

As the foundation for policy development, the consulting team subsequently prepared a detailed *Background Report* describing existing conditions and trends in Patterson. The *Background Report* includes chapters on land use, housing, population, economic conditions and fiscal considerations, transportation and circulation, public facilities and services, recreational and cultural resources, natural resources, health and safety, and scenic resources and urban design. The report also includes the *Community Concerns Summary Report* as an appendix.

The next major step in the process was to identify key issues and options for the general plan and summarize them for public review. These issues and options focused on what the consulting team believed would be the most important policy, program, land use, circulation, and development concerns to be addressed in the general plan.

These issues and options were based largely on the findings in the *Community Concerns Summary Report* and the *Background Report*. They were, however, also the result of discussions among consulting team members and with City officials, other public agencies, industry groups, property owners, developers, community groups, and individual citizens.

Following its release, the *Issues and Options Report* was reviewed for the public at a townhall meeting in December 1988 and considered by the Planning Commission and City Council in an extensive set of hearings and workshops. During January through April 1989, the Planning Commission met seven times to review the *Issues and Options Report* and receive public testimony. The City Council in turn held 17 meetings from May 1989 to May 1990 to review the *Issues and Options Report* and receive public testimony. On May 29, 1990, the City Council made its final recommendations on the *Issues and Options*

*Report.* For each issue discussed in the *Issues and Options Report*, the City Council selected one or more options, in some cases combining options and in other cases modifying the options.

Based on the City Council's direction and in cooperation with City staff, the consulting team prepared the draft goals, policies, and implementation programs and land use and circulation diagrams constituting the *Draft Policy Document* of the *General Plan*. Subsequently, the consulting team prepared a *Draft Environmental Impact Report* (EIR) to meet the requirements of the California Environmental Quality Act. The *Draft Policy Document* was released in February 1991 and the *Draft EIR* during April 1991.

The *Draft General Plan* was reviewed for the public at a townhall meeting in March 1991. During March through July, 1991, the Planning Commission met ten times to review the *Draft General Plan* and receive public testimony. One hearing on May 22, 1991 was specifically to receive public comment on the *Draft EIR*. The City Council in turn held nine meetings during July through November, 1991, to review the *Draft General Plan* and *Draft EIR* and receive public testimony. On November 5, 1991 the City Council gave its final directions on the *Draft General Plan* and directed the Consultants to prepare the *Final General Plan*.

Based on the direction set out by the City Council in November 1991, the consulting team revised the General Plan documents. In February, the City recirculated a *Draft Final EIR* for further public comment. Following public hearings by the Planning Commission and City Council in May 1992, the City Council adopted the *General Plan* on June 11, 1992.

Throughout the general plan preparation and review process the City made every effort to notify the public and community groups of opportunities to be involved in the process. Public hearings and meetings were formally noticed in local newspapers and Patterson newspapers regularly carried topical articles on the progress of the General Plan program.

### C. GENERAL PLAN SUMMARY

The *Patterson General Plan* consists of two documents: the *General Plan Background Report* and the *General Plan Policy Document*. The *General Plan Background Report* inventories and analyzes existing conditions and trends in Patterson. The *Background Report*, which provides the formal supporting documentation for general plan policy, addresses ten subject areas: land use; housing; population; economic conditions and fiscal considerations; transportation and circulation; public facilities and services; cultural and recreational resources; natural resources; health and safety; and scenic resources and urban design. The *Background Report* also includes as an appendix the *Patterson General Plan Community Concerns Report* prepared following the issue identification process carried out in the Spring of 1988.

The *General Plan Policy Document* includes goals, policies, standards, implementation programs, quantified objectives, a land use diagram, and a circulation plan diagram, which collectively constitute the formal policy of the City of Patterson for land use, development, and environmental quality. The following definitions describe the nature of the statements of goals, policies, standards, implementation programs, and quantified objectives as they are used in the *General Plan Policy Document*:

**Goal:** *The ultimate purpose of an effort stated in a way that is general in nature and immeasurable.*



**Policy:** *A specific statement in text or diagram guiding action and implying clear commitment.*

**Standard:** *A specific, often quantified guideline, incorporated in a policy or implementation program, defining the relationship between two or more variables. Standards can often translate directly into regulatory controls.*

**Implementation Program:** *An action, procedure, program, or technique that carries out general plan policy. Implementation programs also specify primary responsibility for carrying out the action and a time frame for its accomplishment.*

**Quantified Objective (housing only):** *The number of housing units that the City expects will be constructed and the number of households the City expects will be assisted through Housing Element Programs during the time frame of the Housing Element.*

The *General Plan Policy Document* is divided into two main parts. Part I contains a description of the land use designations appearing on the diagram of proposed land use and standards of population density and building intensity for the various land use designations. Part I also contains a diagram depicting the proposed circulation system and a description of the street classification system.

Part II of the *Policy Document* contains explicit statements of goals, policies, standards, implementation programs, and quantified objectives. Part II is divided into sections roughly corresponding to the organization of issues addressed in the *General Plan Background Report*. These are: I. Land Use; II. Housing; III. Transportation and Circulation; IV. Public Facilities and Services; V. Recreational and Cultural Resources; VI. Natural Resources; VII. Health and Safety; VIII. City Design, Structure, and Aesthetics; and IX. Administration and Implementation.

Each section includes several goal statements relating to different sub-issues or different aspects of the issue addressed in the section. For each goal statement there are several policies which amplify the goal statement. Implementation programs are listed at the end of each section and describe briefly the proposed action, the agencies or departments with primary responsibility for carrying out the program, and a specified time frame for accomplishing the program. The housing section also includes a statement of quantified housing objectives as required by state housing element law.

#### D. IMPACT SUMMARY

As described in the introduction, the *EIR* assesses the implications within each subject/category (e.g., sewer, agricultural lands, flooding) of the *General Plan Land Use Diagram* without consideration of the policies and programs contained in the *General Plan Policy Document*. The *EIR* then describes the policies contained in the *General Plan Policy Document* that address any negative implications of the *Land Use Diagram*. Next, the *EIR* assesses the impacts of the combination of the *Land Use Diagram* and the policies contained in the *General Plan Policy Document* to reach a determination concerning the level of significance of impacts for CEQA purposes. Finally, the *EIR* identifies mitigation measures to address any remaining adverse or potentially adverse impacts.

The *EIR* concludes that in three major areas the *General Plan*, taken as a whole, will result in significant adverse impacts. These impact areas are traffic congestion, agricultural lands, and regional air quality.

## Traffic Congestion

First, buildout of the *General Plan* with all roadway improvements identified in the *Circulation Plan Diagram* (including development of the southern bypass expressway) will result in peak hour conditions slightly in the Level D range over short stretches of roadways in three locations. Those locations where the model projects Level D peak hour conditions are as follows:

- Interstate 5 north of the Sperry interchange
- Sperry Avenue from Ninth Street to Highway 33
- Ward Avenue between Ninth Street and M Street

While Level D exceeds the *Policy Document's* standard, this level of congestion still represents free flowing traffic conditions, but with increased delay and greater limitations on maneuverability. Many communities use Level D as their service level planning criteria. Therefore, the fact that a few locations will have peak hour conditions within the Level D range generally would not represent a severe adverse environmental impact. Since it exceeds the *General Plan's* Level of Service C standard, however, it is considered a significant impact.

With implementation of the improvements included in the *Policy Document* and the roadway system of the *Circulation Plan Diagram*, no further mitigation measures are expected to be required, with the exception of those roadway segments identified as exceeding Level of Service C. Roadway improvements to improve the level of service at these areas could be undertaken; however, further roadway widening in these cases, however, is not believed to be cost-effective for the relatively small incremental mitigation required to bring them within the Level C range.

A second area where a potentially significant impact on traffic results is the southern bypass expressway. As part of the County's proposed expressway system, the City is intending to rely to a large extent on the funding mechanisms outlined in the *Expressway Study* for its construction, including a proposed County sales tax increase. Since the City cannot guarantee the success of these funding mechanisms, or whether development of the Patterson expressway will be a high priority for the County, the possibility exists that it will not be built within the time frame of the *General Plan*. Without the southern bypass expressway (i.e., with only the Sperry Avenue-Orange Avenue improvements), the Level of Service along Sperry Avenue, Highway 33, and East Las Palmas Avenue will reach Level of Service E and F. This therefore represents a potentially significant impact.

Possible mitigation of this impact could include full City funding of the expressway, although this would probably not be economically feasible. Another way to reduce this potential impact would be to include policies and programs for the City to work with the County in developing funding for the southern bypass expressway, including City participation, and to promote its development within the time frame of the *General Plan*.

## Agricultural Land

The *EIR* identifies the loss of productive agricultural land through urbanization as a significant impact. The nonrenewal and cancellation of Williamson Act contracts is also considered a significant impact. These impacts cannot be mitigated without removing land from the Planning Area or designating the land for agricultural uses.

The alignment of the southern bypass expressway along the southern Planning Area boundary could, over the long-term, have a growth-inducing impact on lands south of the bypass. This land is outside the Planning Area and is not considered for urban development as part of the *General Plan*. Any such urban development would, however, result in the premature conversion of agricultural lands in this area. This is considered a potentially significant impact, which could be mitigated by moving the alignment of the roadway further to the north.

### **Regional Air Quality**

The *EIR* concludes that development under the *General Plan* will have a significant impact on regional air quality. Because Stanislaus County is already in nonattainment of federal and state air quality standards, any new development in the region will contribute to regional air pollutant emissions and will further delay attainment of federal and state standards. While the *General Plan* includes policies which would mitigate air quality impacts, the impact on regional air quality is considered a significant adverse impact.

The *EIR* suggests that the impact on regional air quality from the emission of ozone precursors could be reduced with the addition of the following policy:

- The City should review development projects using criteria established by the San Joaquin Unified APCD in order to minimize future increases in vehicle travel and to assist in implementing appropriate indirect source regulations adopted by the APCD.

The extent to which the addition of this policy would mitigate the impacts on regional air quality depends on the effectiveness of the regulations adopted by the San Joaquin Unified APCD in achieving attainment of federal and state air quality standards. Since the regulations have not been adopted or implemented at this time, even with the addition of this mitigation measure, the impact on regional air quality is still considered potentially significant.





## CHAPTER II

### ASSUMPTIONS AND BUILDOUT CALCULATIONS

#### A. INTRODUCTION

This chapter summarizes the new development potential that would be allowed under the *General Plan* and the assumptions upon which these buildout calculations are based. These buildout calculations are in turn used as the basis of much of the impact assessment in the rest of this report.

#### B. RESIDENTIAL DENSITY AND BUILDING INTENSITY ASSUMPTIONS

The following general assumptions concerning residential intensity, population density, and building intensity were used in developing calculations of buildout potential under the *General Plan*. For each land use designation, the *General Plan Policy Document* specifies either a range of residential intensities for residential uses or a maximum floor-area ratio (FAR) for nonresidential uses.

Standards of building intensity for residential uses are stated as the allowable number of dwelling units per gross acre. The assumed average number of persons per dwelling unit for each residential designation has been extrapolated from countywide estimates by the California Department of Finance (DOF).

Standards of building intensity for non-residential uses are stated as maximum floor-area ratios (FARs). An FAR is a ratio of the gross building square footage permitted on a lot to the net square footage of the lot. For example, on a site with 10,000 net square feet of land area, an FAR of 1.0 will allow 10,000 gross square feet of building floor area to be built. On the same site, an FAR of 1.5 would allow 15,000 square feet of floor area; an FAR of 2.0 would allow 20,000 square feet; and an FAR of 0.5 would allow 5,000 square feet.

The buildout assumptions (i.e., dwelling units per acre, FAR) used in this EIR are, however, lower than the maximum intensities specified in Part I of the *General Plan Policy Document* for the various land use designations. These lower assumptions are reasonable expectations, based on historical experience, for the likely intensity of actual development. These assumed residential intensities and FARs have been applied to the acreage within each land use designation to develop buildout calculations. Appendix D details the specific assumptions for the various areas of the Planning Area, and Appendix E summarizes development potential for each subarea (see discussion under Section C, Planning Area).

##### 1. Residential

**Low Density Residential (LR)** 1.1 to 5.0 units per gross acre. Assumes residential buildout at 4.0 units per gross acre with 3.00 persons per dwelling unit.

**Downtown Residential (DR)** 3.1 to 10.0 units per gross acre. Assumes residential buildout at 7.0 units per gross acre with 2.75 persons per dwelling unit.

**Medium Density Residential (MR)** 5.1 to 12.0 units per gross acre. Assumes residential buildout at 10.0 units per gross acre with 2.50 persons per dwelling unit.

**High Density Residential (HR)** 12.1 to 20.0 units per gross acre. Assumes residential buildout at 16.0 units per gross acre with 2.50 persons per dwelling unit.

## **2. Commercial**

**Neighborhood Commercial (NC)** The floor-area ratio (FAR) shall not exceed 0.40. Assumes commercial buildout at an FAR of 0.25.

**Highway Service Commercial (HSC)** The floor-area ratio (FAR) shall not exceed 0.40. Assumes commercial buildout at an FAR of 0.25.

**Downtown Core (DC)** The floor-area ratio (FAR) shall not exceed 0.40. Assumes commercial buildout at an FAR of 0.25.

**General Commercial (GC)** The floor-area ratio (FAR) shall not exceed 0.40. Assumes commercial buildout at an FAR of 0.30.

**Medical/Professional Office (MP)** The floor-area ratio (FAR) shall not exceed 0.40. Assumes office buildout at an FAR of 0.25.

## **3. Industrial**

**Light Industrial (LI)** The floor-area ratio (FAR) shall not exceed 0.50. Assumes buildout at an FAR of 0.25. For undeveloped areas, assumes 15 percent reduction in gross developable acreage to account for streets and roads.

**Heavy Industrial (HI)** The floor-area ratio (FAR) shall not exceed 0.50. Assumes buildout at an FAR of 0.25. For undeveloped areas, assumes 15 percent reduction in gross developable acreage to account for streets and roads.

## **4. Reserve**

**Residential Reserve (RR)** No buildout potential within the time frame of the *General Plan* is assumed.

## **5. Other**

**Public/Quasi-Public (PQP)** Assumes buildout per specific proposals where available.

**Parks and Recreation (PR)** Assumes buildout per specific proposals where available.

**Agriculture (AG)** Minimum parcel size is forty (40) acres and residential uses are limited to one (1) unit per parcel. Assumes no new residential development.



## C. PLANNING AREA

The Planning Area for the *General Plan* is depicted in Figure II-1. No land outside the Planning Area is designated for urban development within the time frame of the *General Plan*.

For the purposes of preparing buildout calculations and geographically describing impacts, the Planning Area has been divided in 17 subareas. These subareas have been established for purposes of analysis only; they are not identified as part of the *General Plan Policy Document* and will not necessarily be used by the City for any ongoing planning efforts. Figure II-1 shows the boundaries of these subareas; Appendix C summarizes the assumptions used to calculate development potential; and Appendix D contains a detailed tabulation of the development potential for each area.

## D. SCHOOLS

The only future school designated specifically on the *Land Use Diagram* is a potential site for a new junior high school designated Public/Quasi-Public (PQP). It is assumed that the existing high school/junior high school site would be converted to a high school and a new junior high school site would be needed. No specific sites for future elementary schools are shown on the *General Plan Land Use Diagram*. The Consultants assume, however, that several new elementary schools will be needed (see section on Schools in Chapter V, Public Facilities and Services).

## E. PARKS AND RECREATION FACILITIES

No specific sites for future parks are shown on the *General Plan Land Use Diagram* with the exception of the public plaza and community/senior center site. The locations of most future parks are yet to be determined. The *General Plan Policy Document* sets forth a standard of five acres of parkland per 1,000 residents (see section on Parks in Chapter VI, Recreational and Cultural Resources). Specific park sites will be identified when the City prepares a master plan for parks and recreation as set forth in the *General Plan Policy Document*.

## F. QUALIFICATIONS CONCERNING BUILDOUT CALCULATIONS

The following four sections quantify existing and new growth and development allowed under the *General Plan* in terms of the housing stock, population, commercial and industrial development, and employment. Projections of future growth and development are based on buildout calculations (Appendix D), which are in turn based on the application of the buildout assumptions (Section B of this chapter) to the land uses shown on the *General Plan Land Use Diagram*.

Ultimately, the buildout calculations presented in Appendix D represent a "credible worst-case scenario" for buildout under the *General Plan*. On one hand, the buildout calculations are based on assumptions for residential intensities and floor-area ratios that are somewhat lower than the maximum intensities legally possible under the *General Plan*. On the other hand, the buildout calculations assume full buildout of virtually all lands at the assumed residential intensities and floor-area ratios. Ultimately, these two sets of assumptions are likely to offset each other, resulting in a "credible worst-case scenario."

The assumed residential intensities are generally 80 percent of the maximum intensities legally possible under the *General Plan*. The assumed floor-area ratios generally range from 50 percent to 80 percent of the maximum floor-area ratios legally possible under the *General Plan*. These assumptions are based on discussions with City staff, developers, and planners in other Northern California and Central Valley communities concerning intensities typical of the type of development likely to occur in Patterson under the *General Plan*. While, in any one instance, a development may exceed the intensity assumed in Section B of this chapter, the buildout calculations assume that development will "on average" occur at the assumed intensities.

The second major set of assumptions concerns the timing of full buildout. In the aggregate, the buildout calculations depict major growth potential for Patterson in the residential, commercial, and industrial categories. Based on *General Plan* policy, it is assumed that not all the non-reserve designations will actually develop during the time frame of the *General Plan* (1992 to 2011).

Using the combined assumptions of legal maximum intensities and full buildout within the time frame of the *General Plan* would likely result in an overstatement of "effective" development potential and, in turn, lead to such problems as oversizing infrastructure and underfunding infrastructure improvements.

## **G. EXISTING AND PROJECTED HOUSING STOCK**

The *EIR* relies on the Land Use Inventory conducted in January 1988 and updated in November 1990 to establish the existing (Fall 1990) housing stock totals and estimates of new housing unit potential at buildout of the non-reserve designations of the *General Plan Land Use Diagram*. It is assumed that not all these units will be constructed during the time frame of the *General Plan*. Table II-1 shows these totals as they are distributed within the residential land use designations shown on the *Land Use Diagram*. The reader should note that, because of differences in estimation methodology, the baseline numbers for Fall 1990 differ slightly from estimates published by the California Department of Finance. These units reflect the housing units constructed as of Fall 1990; some of these units may not have been occupied as of that date.









TABLE II-1

**EXISTING AND PROJECTED DWELLING UNITS**  
**Patterson Planning Area**  
**1990 and Buildout of General Plan Land Use Diagram**

	LR	DR	MR	HR	RR	Other <sup>1</sup>	Total
Existing Units	1,613	701	101	292	32	239	2,978
New Units	6,403	351	598	436	0	0	7,789
Lost Units <sup>2</sup>	--	--	--	--	--	-58	-58
<b>Total Units</b>	<b>8,016</b>	<b>1,052</b>	<b>699</b>	<b>728</b>	<b>32</b>	<b>181</b>	<b>10,708</b>

<sup>1</sup>Housing units in non-residential *General Plan* designations.

<sup>2</sup>Existing units to be removed through conversion to other land uses (see Appendix C).

## H. EXISTING AND PROJECTED POPULATION

To estimate existing population as of Fall 1990, the Consultants applied California 1990 Department of Finance estimates of population per household and vacancy to the dwelling units estimated by the Land Use Inventory, as shown in Table II- 2.

TABLE II-2

**EXISTING (FALL 1990) POPULATION**  
**Patterson Planning Area**

	Dwelling Units	Vacancy Rate <sup>1</sup>	Population per Household <sup>1</sup>	Total Population
Existing City Limits	2,792	4.61%	3.33	8,869
Unincorporated Planning Area	186	5.59%	2.78	488
<b>Total Planning Area</b>	<b>2,978</b>			<b>9,357</b>

<sup>1</sup>January 1990 estimates from the California Department of Finance for City of Patterson and unincorporated Stanislaus County

To estimate population at buildout of the non-reserve land use designations, Mintier & Associates first developed assumed population per dwelling unit factors for each residential land use designation used in the *General Plan* and then applied these factors to the dwelling unit projections shown in Table II-1. The

population per dwelling unit estimates were derived using countywide and valleywide averages, and reasonable assumptions concerning ratios between single and multi-family housing. While Patterson's 1990 population per household, as estimated by the California Department of Finance, was 3.33, general trends toward smaller households and anticipated changes in demographics suggest that the average household size is more likely to reflect countywide averages as Patterson grows.

In addition, since DOF's estimates are gross figures and do not distinguish household size by housing type (i.e., single-family, multi-family), Mintier & Associates had to extrapolate to arrive at assumed persons-per-unit estimates for each residential land use designation. The results of these calculations are the assumptions shown in Table II-3.

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**TABLE II-3**  
**POPULATION PER DWELLING UNIT ASSUMPTIONS**

Dwelling Unit Type	Population Per Unit
Low Density Residential <sup>1</sup>	3.00
Downtown Residential <sup>2</sup>	2.75
Medium Density Residential <sup>3</sup>	2.50
High Density Residential <sup>3</sup>	2.50

<sup>1</sup>Assumes single family dwelling units

<sup>2</sup>Assumes combination of single family dwelling units, secondary units, duplexes, and triplexes

<sup>3</sup>Assumes medium density multi-family dwelling units

<sup>4</sup>Assumes high density multi-family dwelling units

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Table II-4 shows the population holding capacities which result from applying the population per unit estimates in Table II-3 to potential new dwelling unit estimates shown in Table II-1. The final column indicates the population resulting from overall housing stock occupancy of 95 percent (i.e., assuming a five percent vacancy rate). Again, it should be noted that full buildout of all non-reserve land use designations is not assumed to occur within the time frame of the *General Plan*.



TABLE II-4

**ESTIMATED POPULATION HOLDING CAPACITY**  
**Patterson Planning Area**  
**1990 and Full Buildout of General Plan Land Use Diagram**

	LR	DR	MR	HR	RR	Other	Total
Pop in Existing Units <sup>1</sup>							9,357
Pop in New Units <sup>2</sup>	18,248	917	1,421	1,037	--	--	21,623
Displaced Population <sup>3</sup>	--	--	--	--	--	-191	-183
<b>Total Units</b>							<b>30,798</b>

<sup>1</sup>From Table II-2

<sup>2</sup>From Table II-1 and Table II-3, assumes a residential vacancy rate of 5 percent

<sup>3</sup>From Table II-1; assumes a 4.61% vacancy rate and population per household of 3.33

## I. EXISTING AND PROJECTED COMMERCIAL AND INDUSTRIAL DEVELOPMENT

Estimates of existing and projected commercial and industrial acreage have been made using information collected as part of the Land Use Inventory; no effort has been made to estimate existing square footage totals for existing development. Square footage development estimates for future commercially- and industrially-designated land have, however, been developed. The Consultants applied assumed floor-area ratios (FARs) to acreage totals for currently vacant land.

Table II-5 shows the vacant and underutilized acreage falling into each commercial and industrial land use designation on the *Land Use Diagram* and the estimated *new* square footage totals for development expected to occur on currently vacant land or underdeveloped land in each of these categories. For large undeveloped areas, the Consultants assumed a 15 percent reduction in gross developable acreage to account for streets and roads.

TABLE II-5

**TOTAL VACANT/UNDERUTILIZED COMMERCIAL AND INDUSTRIAL ACREAGE  
AND NEW SQUARE FOOTAGE**

<b>General Plan Designation</b>	<b>Total Acreage</b>	<b>New Square Footage</b>
Neighborhood Commercial (NC)	10	109,000
Downtown Core (DC)	63	686,000
General Commercial (GC)	42	549,000
Highway Service Commercial (HSC)	109	1,187,000
Medical/Professional Office (O) <sup>1</sup>	26	54,000
Light Industrial (LI) <sup>2</sup>	491	6,416,000
Heavy Industrial (HI) <sup>2</sup>	96	1,045,000

<sup>1</sup>Total acreage includes 12 acres assumed for new hospital site

<sup>2</sup>15 percent reduction applied to account for roads and streets

Table II-5 shows the total vacant and underutilized commercial and industrial land within the Planning Area. For purposes of analysis, it is assumed that all non-residential land will develop within the time frame of the *General Plan*, as the *General Plan* does not establish any non-residential development targets. The market will ultimately determine the rate of absorption of non-residential uses, however, so it should be noted that full buildout of commercial and industrial lands within the Planning Area may not occur by 2011.

## J. EMPLOYMENT GROWTH

By applying typical employee density assumptions to the square footage estimates shown in Table II-5 with an assumed 90 percent occupancy rate (based on discussions with commercial real estate agents), the Consultants have estimated the number of new industrial and commercial jobs that the land uses shown on the *General Plan Land Use Diagram* will generate. Table II-6 shows the estimated new employees to be generated along with the square-feet-per-employee assumptions used for each employment-generating land use designation.

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**TABLE II-6**  
**COMMERCIAL AND INDUSTRIAL EMPLOYMENT**

New General Plan Designation	Total New Square Footage	Square Feet Per Employee	New Employees
Neighborhood Commercial (NC)	109,000	500	196
Downtown Core (DC)	686,000	500	1,235
General Commercial (GC)	549,000	500	988
Highway Service Commercial (HSC)	1,187,000	500	2,187
Medical/Professional Office (MP)	54,000	300	97
Light Industrial (LI)	6,416,000	750	7,699
Heavy Industrial (HI)	1,045,000	750	1,254
Public/Quasi-Public (PQP) <sup>1</sup>	--	--	400
<b>Total</b>			<b>14,006</b>

<sup>1</sup>Estimate of new hospital district, school district, City, and County employees in Patterson in 2011

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Again, it should be noted that although full buildout of non-residential land use designations is assumed for purposes of analysis, market forces will ultimately determine the rate of development of employment-generating uses in Patterson, and the City may not reach the total number of new employees at full buildout shown in Table II-6 by 2011.





## CHAPTER III

### LAND USE, HOUSING, AND POPULATION

#### A. INTRODUCTION

This chapter outlines the implications of the *General Plan* for land use, housing, and population.

#### B. LAND USE

Existing land use conditions are described in Chapter I of the *General Plan Background Report* and development potential estimates for the *General Plan* are discussed in Chapter II of this *EIR*.

##### 1. Implications of the General Plan Land Use Diagram

According to Appendix I of the *State CEQA Guidelines*, the primary concern with respect to land use is whether or not a proposal will substantially alter the present or planned land use of an area. The 1992 *General Plan* would make minor changes in the pattern of existing land use in Patterson but would provide for additional development and differs in several important respects from the current *General Plan*.

The alterations in the existing patterns of land use would consist of changes in current uses, and new development of currently undeveloped areas. Table III-1 summarizes the acreage within the various land use categories as depicted on the *Land Use Diagram*.

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TABLE III-1

#### TOTAL ACREAGE WITHIN GENERAL PLAN LAND USE DESIGNATIONS

Residential		Commercial		Industrial		Other		Reserve	
LR	2,089	NC	10	LI	498	PQP	142	RR	310
DR	159	DC	93	HI	182	PR	8		
MR	84	GC	80						
HR	55	HSC	109						
		MP	31						
Total (and percent of total non-reserve designations)									
2,387 (67%)		323 (9%)		680 (19%)		250 (4%)		--	

---

The *General Plan* would provide for urban development in currently-undeveloped areas within the city and provide for urban development of lands surrounding the city presently vacant or devoted to agricultural uses.

From an environmental standpoint, the most critical land use changes would result from new development of currently-undeveloped areas, particularly in areas currently used for agricultural production and in areas containing sensitive natural resources. These topics are addressed separately in Chapter VII, Natural Resources.

The rate at which Patterson's vacant land will be absorbed or converted to urban uses will be largely dictated by market conditions and the availability of public services and facilities as well as *General Plan* policy. It is assumed, however, that not all of the land designated on the *Land Use Diagram* will develop within the time frame of the *General Plan*.

The 1992 *General Plan* would also alter currently planned land uses in Patterson compared to the 1978 *General Plan*. The 1992 *General Plan* provides for 2,100 additional acres of non-reserve-designated land and 310 acres of reserve-designated land. It is assumed that not all the non-reserved designations and none of the reserve designations will develop within the time frame of the *General Plan*. The 1992 *General Plan* provides a higher proportion of commercial and office land use designation (9 percent versus 4 percent), a higher proportion of industrial land uses (19 percent versus 15 percent), and a lower proportion of residential land use designations (67 percent versus 81 percent).

### **LAFCO Sphere of Influence**

Patterson's existing sphere of influence as determined by the Stanislaus County Local Agency Formation Commission (LAFCO) is coterminous with the City's 1978 *General Plan* boundaries. The city's existing sphere of influence is illustrated in the *General Plan Background Report* (Figure I-7). The 1992 *General Plan* designates an additional 2,100 acres outside the existing sphere of influence in non-reserve designations, and another 310 acres in reserve designations.

For development to proceed according to the revised Patterson *General Plan*, the City would have to petition LAFCO for a change in its sphere of influence. The following LAFCO policies for review of proposals are included in LAFCO's *Policies and Procedures Manual*, August 1991, and are relevant to the Patterson *General Plan*:

101. Encouraging orderly formation and development of agencies:
  - 01 The sphere of influence determined by the Commission shall take into account the provision of an adequate level and range of services to each community within the county. . .
  - 02 Any proposal for a change of organization or reorganization shall contain sufficient information to determine that adequate services, facilities, and improvements can be provided and financed by the agencies responsible for the provision of such services, facilities, and improvements.



- 03 Any proposal for a change of organization or reorganization which will result in residential development shall address the impact on public school facilities and provide upon submittal of and application, sufficient information to determine that adequate services and facilities can be provided.
- 103 Encouraging orderly urban development and preservation of open space patterns:
- 01 The Commission encourages well planned, orderly, and compact urban development patterns for all developing areas. Also, the county, cities, and those districts providing urban services are encouraged to develop and implement plans and policies which will provide for well-planned, orderly and compact urban development patterns, with consideration of preserving permanent open space lands within those urban patterns.
  - 02 Development of existing vacant non-open space, and non-prime agricultural land within an agency's boundaries is encouraged prior to further annexation and development.
  - 03 Annexation proposals to cities or districts providing urban services of undeveloped or agricultural parcels shall show: that urban development is imminent for all or a substantial portion of the proposal area; that urban development will be contiguous with existing or proposed development; and that a planned, orderly, and compact urban development pattern will result. Proposals resulting in leap frog, non-contiguous urban development patterns shall be discouraged.
- 104 Encouraging conservation of prime agricultural lands and open space areas:
- 01 Proposals which would conflict with the goals of maintaining the physical and economic integrity of open space lands, agricultural lands, or agricultural preserve areas in open space uses, as indicated on the city or county general plan, shall be discouraged.
  - 02 Annexation and development of existing vacant non-open space lands, and non-prime agricultural land within an agency's sphere of influence should occur prior to development outside of an existing sphere of influence.
  - 03 Loss of agricultural lands should not be a primary issue for annexation where city and county general plans indicate urban development is appropriate and there is consistency with the agency's sphere of influence.

Subsequent chapters of this *EIR* provide information on the ability to adequately provide services, including school services. The *General Plan Land Use Diagram* does, however, provide for urban development on agricultural lands outside the city's existing sphere of influence.

### Stanislaus County General Plan

Land use designations and pertinent policies in the *Stanislaus County General Plan* are discussed in Chapter I of the *General Plan Background Report*.

The *Stanislaus County General Plan* designates all unincorporated land within Patterson's existing sphere of influence as Urban Transition, with the exception of a small area on either side of Sperry Avenue designated for Highway Commercial.

The Urban Transition designation is intended to ensure that land remains in agricultural use until urban development consistent with a city's general plan designation is approved. The *County General Plan* designates the area southeast of the city within the *1978 General Plan* for industrial use. All remaining land outside the existing sphere of influence within the *1992 General Plan* is designated for agricultural uses.

Stanislaus County published a *Draft Agricultural Element* to its *General Plan* in February 1990. The County revised the *Draft Agricultural Element* based on comments received on the first draft, and released the revised version in December 1991 which was adopted in April 1992. The *Agricultural Element* is summarized in the *General Plan Background Report*. Relevant policies described under "Expansion of Cities and Unincorporated Communities" include the following:

- 2.8. The County recognizes the right of cities and unincorporated communities to grow and prosper and shall not oppose reasonable requests to expand spheres of influence of cities or community services districts and sanitary districts serving unincorporated communities to accommodate growth.
- 2.9. In recognition that unincorporated land within spheres of influence of cities or community services districts and sanitary districts serving unincorporated communities ultimately will be urbanized, the County shall cooperate with cities and unincorporated communities in managing development in urban transition areas.
- 2.10. The County shall continue to encourage the upgrading of existing unincorporated communities.
- 2.11. The County shall discourage the expansion of spheres of influence of cities or community services districts and sanitary districts serving unincorporated communities into its most productive agricultural areas.

The *Agricultural Element* proposes as an implementation measure the mapping of "the most productive agricultural areas. As discussed in Chapter VII of this *EIR*, development under the *General Plan*, and presumably Patterson's sphere of influence, will result in conversion of prime agricultural lands.

## **2. General Plan Policy Response**

Among others, the following policies address the general land use implications of the *Land Use Diagram*:

- I.A.1. The City shall seek to preserve Patterson's traditional small-town qualities and agricultural heritage, while increasing its residential and employment base.
- I.A.2. Growth in Patterson shall be planned and guided consistent with the following population limits and land use principles:



- Population limit of 17,000 residents by the end of the seventh year.
  - Population limit of 19,000 residents by the end of the fifteenth year.
  - Population limit of 21,000 residents by the end of the twentieth year.
  - Concentrate community commercial, high-density residential, and public facilities uses in the downtown area and its western extension.
  - Emphasize a mixture of residential types and densities.
  - Ensure that ample buffers are established between incompatible land uses.
  - Provide for an orderly sequence of development based on the logical extension of public facilities and services. Projects which extend such facilities and services shall be given priority in the allocation of growth, consistent with the target population levels set forth above, and shall be afforded such assurances (e.g., development agreements) as may be necessary to ensure that future facilities and service are adequate and properly extended.
- I.A.3. The City shall take full advantage of the development, planning, and infrastructure improvement opportunities afforded by larger undeveloped land parcels west of the present city limits.
- I.A.4. The City shall link the rate of growth in Patterson to the provision of adequate services and infrastructure, including schools. The City shall, through specific plans and/or planned unit development plans for major projects, ensure that growth occurs in an orderly fashion and in pace with the expansion of public facilities and services.
- I.A.5. The City shall monitor residential and non-residential development and encourage adjustments as necessary in land use designations and the rate of project approvals to promote a reasonable citywide balance between new employment-generating development and housing development and to minimize traffic impacts.
- I.A.6. The City shall ensure its designation of land uses and approval of development projects do not hinder efforts to maintain a positive fiscal balance for the City.
- I.A.7. The City shall promote growth that reinforces the downtown and its western extension as the geographic and economic center of Patterson.
- I.A.8. Land within the Planning Area shall ultimately be developed to urban standards consistent with the population limits set out in Policy I.A.2. Pending connection with City sewer service, such land shall remain in agricultural, open space, or other low intensity uses.
- I.A.9. The City shall interact with the County to ensure that development approved by the County on unincorporated lands within the Patterson Planning Area is developed to standards consistent with City standards, including architectural compatibility, provision of adequate infrastructure improvements, and provision of City sewer service.
- I.A.10. The City shall seek a formal agreement with the County concerning land use and infrastructure along the Sperry Avenue and East Las Palmas Avenue corridors to ensure that development in this area complies with City building and design standards, will hook up to City sewer service, and will participate in solutions to Salado Creek and Black Gulch Creek flooding.



### 3. Impacts

The impacts of the *General Plan* on land use are deemed to be not significant for the purposes of CEQA. For CEQA purposes, most changes in land use do not in themselves result in direct *environmental* impacts. The environmental impacts occur primarily as the changes in land use affect valuable *environmental* resources, such as prime agricultural land or wildlife habitat. These secondary and tertiary impacts of land use changes are discussed in subsequent chapters of the *EIR*.

Furthermore, CEQA does not require that economic or social impacts be assessed as significant or potentially significant *environmental* impacts (*State CEQA Guidelines*, §15131).

### 4. Mitigation Measures

None required.

## C. HOUSING

The existing housing stock and housing-related issues are described in Chapter II of the *General Plan Background Report*, and the housing-related changes which would result from the *General Plan* are summarized in Chapter II of this *EIR*.

### 1. Implications of the General Plan Land Use Diagram

According to Appendix I of the *State CEQA Guidelines*, the most important housing-related considerations are whether a proposal will affect existing housing or create a demand for additional housing. As Tables II-1 and II-5 in Chapter II show, the *General Plan* would do both, designating land both for new residential development and for commercial and industrial development that will generate demand for housing.

As described in Chapter II, the *General Plan* provides for 7,789 new housing units and 14,000 new employees. Assuming 1.5 workers per household, new housing will accommodate approximately 11,700 participants in the work force. Therefore, the *General Plan* provides for more employment opportunities than housing to accommodate this work force. Patterson currently, however, exports most of its workers to employment centers outside Patterson, primarily in the San Francisco Bay Area. Provision for more employment-generating land uses provides the opportunity for existing residents to find local jobs. Market demand is likely to favor residential development over non-residential development, at least for the near term. Furthermore, it is not anticipated that all the residential or non-residential land use designations will build out within the time frame of the *General Plan*.

Overall, the housing-related implications of the *General Plan* can be classified as either primary or secondary. Primary implications are those resulting directly from the construction of new housing, including the addition of more units to the city's total housing stock and the effect on the existing housing stock. Secondary implications are those indirectly resulting from construction of new units, such as increased traffic resulting from new residential development and increased demands on public facilities and services. These secondary implications of housing development are discussed in subsequent chapters of this *EIR*.

## 2. General Plan Policy Response

The *General Plan* includes policies designed to offset the negative housing-related implications of the *Land Use Diagram*. For instance, in addition to simply designating land for the future development of housing, the *General Plan* also includes goals, policies, and implementation programs that emphasize the preservation and rehabilitation of the existing housing stock, the assurance of high quality new housing, and the ongoing maintenance of programs designed to accommodate those with special housing needs. In addition, the *General Plan* calls for the development of more local employment to promote a reasonable citywide balance between new employment generating development and housing development.

Relevant housing-related policies in the *General Plan* include the following:

### New Housing Opportunities

- I.B.1. The City shall maintain an adequate supply of residential land in appropriate land use designations and zoning categories to accommodate projected household growth, maintain normal vacancy rates, and minimize residential land costs.
- I.B.2. The City shall promote the development of affordable housing to meet the needs of low-and moderate-income households.
- I.B.3. Generally, higher density housing shall be located in areas served by the full range of urban services, preferably along collector and arterial streets, and within walking distance of shopping areas.
- II.A.1. The City shall continue to promote the development of a broad mix of housing types.
- II.A.2. The City shall maintain an adequate supply of residential land in appropriate land use designations and zoning categories to accommodate projected household growth, maintain normal residential vacancy rates, and minimize residential land costs.
- II.A.3. While promoting the provision of housing for all economic segments of the community, the City shall seek to ensure the highest quality in all new residential development.
- II.A.4. The City shall require developers of new residential projects of five or more units to develop five percent of all project units as moderate-income housing and five percent of all project units as very-low- and low-income housing. As an alternative to developing the units on site, the developer may pay an equivalent in-lieu fee for the purpose of developing moderate- and low-income housing.
- II.A.5. The City shall pursue all available state and federal funding assistance that is appropriate to Patterson's needs to develop housing that is affordable to low- and moderate-income households.
- II.A.6. The City shall use techniques such as mortgage revenue bonds or other mortgage-backed securities to develop affordable housing.

- II.A.7. The City shall promote the expeditious processing and approval of residential projects that conform to *General Plan* policies and City regulatory requirements. To this end, the City shall work with developers in preparing specific plans and planned unit development plans, and in the expeditious annexation of land for housing development.
- II.A.8. Consistent with other City objectives, the City shall attempt to ensure that its policies, regulations, and procedures do not add unnecessarily to the costs of producing housing.
- II.A.9. The City shall provide for the development of secondary residential units, as required by state law, while protecting the single-family character of neighborhoods. Development of secondary residential units fronting on alleys, particularly in the Downtown Residential designation, shall be encouraged.
- II.A.10. In accordance with provisions of state law, the City shall grant density bonuses of at least twenty-five (25) percent and at least one other specified incentive for qualifying projects to promote the inclusion of very-low- and low-income and senior citizen housing.
- II.A.11. If below-market-rate units are included in a project pursuant to the density bonus program or other local, state, or federal requirements, the City shall require buyer/renter eligibility screening and resale/rent controls for at least 10 years to maintain affordability of the units to originally-targeted income groups.
- II.A.12. Where residential units which are required to sell or rent at below-market-rates are included within a housing development, such units shall be interspersed within the development, and to the extent reasonable, shall be visually indistinguishable from market-rate units.
- II.A.13. The City shall allow the installation of mobilehomes and factory-built housing on permanent foundations consistent with the requirements of state law and in accordance with the City's residential design standards.
- II.A.14. Emergency shelters and transitional housing shall be allowable uses in the Downtown Residential, Medium Density Residential, and High Density Residential designations.
- II.A.15. The City shall continue to work with the Stanislaus County Housing Authority in the administration of affordable housing programs.
- II.A.16. The City shall promote homeownership in new housing constructed for low- and moderate-income households, including programs such as self-help housing.
- II.A.17. The City shall strive to meet, if not exceed, its fair share of the region's housing needs for very-low-, low-, and moderate-income housing as determined by the Stanislaus Area Association of Governments..
- II.A.18. The City shall encourage a mix of housing types throughout the city in order to increase residential choices.



- II.A.20. The City shall support the continued use of Section 8 rent certificates/vouchers by Patterson residents.
- II.A.21. The City shall promote the establishment of a new nonprofit housing developer or work with existing nonprofit developers to help develop affordable housing.
- II.A.22. To alleviate current citywide and countywide housing needs and consistent with state housing law and other goals and policies of this section, the City shall promote the granting of preference to purchase affordable housing developed in the city to low- and moderate-income households currently residing in the city or county.

#### **Preservation and Rehabilitation**

- I.B.4. The City shall promote the preservation of the integrity of existing stable residential neighborhoods.
- II.A.19. The City may use Community Development Block Grant (CDBG) funds in conjunction with private financial institutions to write down interest rates for home purchase or rehabilitation.
- II.B.1. The City shall encourage private reinvestment in older residential neighborhoods and private rehabilitation of housing.
- II.B.2. The City shall pursue all available state and federal funding assistance that is appropriate to Patterson's needs to rehabilitate housing. Housing rehabilitation efforts shall continue to be given high priority in the use of CDBG funds.
- II.B.3. The City shall support the revitalization of older neighborhoods by keeping streets and other municipal systems in good repair.
- II.B.4. The City shall promote the continued upkeep of existing mobilehome parks.
- II.B.5. The City shall require abatement of unsafe structures, giving property owners ample opportunities to correct deficiencies.
- II.B.6. The City shall promote the preservation of architecturally and historically significant residential structures.

#### **Services to Support Housing**

- II.D.1. The City shall work with the Patterson Unified School District to ensure the availability of adequate school facilities to meet the needs of projected households in Patterson.
- II.D.2. The City shall support the use of CDBG funds for upgrading streets, sidewalks, and other public improvements.
- II.D.3. The City shall ensure that new residential development pays its share in financing public facilities and services.

- II.D.4. The City shall strive to ensure that necessary public facilities and services are available prior to occupancy of residential projects.
- II.D.5. The City shall promote infill residential development where adequate public facilities and services are already in place.

### **Equal Housing Opportunity**

- II.E.1. The City shall give special attention in housing programs to the needs of special groups, including the physically and mentally disabled, large families, farmworkers, the elderly, and families with lower incomes.
- II.E.2. The City shall refer all fair housing complaints to the California Department of Fair Employment and Housing and shall make available to the public information on the enforcement activities of the State Fair Employment and Housing Commission.
- II.E.3. The City shall seek to work with the County and surrounding jurisdictions to address the needs of the homeless on a regional basis.
- II.E.4. The City shall cooperate with community-based organizations which provide services or information regarding the availability of services to the homeless.

These policies are supported by numerous implementation programs.

The quantified objectives in the housing section of the *General Plan Policy Document* project development of 1,490 units during the six-year time frame of the Housing Element (June 30, 1991 -July 1, 1997). This exceeds the total new construction need projection for the same period of 964 units, which is based on the regional fair share estimates for Patterson provided by the Stanislaus Area Association of Governments; however, it does not meet the projected fair share need by income category for very-low-income households.

### **3. Impacts**

The primary effects of the *General Plan* on housing will be substantial in terms of increasing the total housing stock and in changing the composition of the housing stock, but, these impacts are deemed to be not significant for the purposes of CEQA. For CEQA purposes, most changes in land use and in the existing housing stock do not in themselves result in direct *environmental* impacts. The environmental impacts occur primarily as the changes in land use and the housing stock affect valuable *environmental* resources, such as prime agricultural land, wildlife habitat, and historically or architecturally significant resources. The secondary and tertiary impacts of land use changes and residential development are discussed in subsequent chapters of the *EIR*.

Furthermore, CEQA does not require that economic or social impacts be assessed as significant or potentially significant *environmental* impacts (*State CEQA Guidelines*, §15131).

#### 4. Mitigation Measures

None required.

### D. POPULATION

Existing population characteristics and population projections are discussed in Chapter III of the *General Plan Background Report*, and the population changes which will result from the *General Plan* are summarized in Chapter II of this *EIR*.

#### 1. Implications of the General Plan Land Use Diagram

According to Appendix I of the *State CEQA Guidelines*, the most important question concerning population is whether a project will alter the location, distribution, density, or growth rate of the human population of an area. As Table II-4 in Chapter II shows, the *General Plan* will significantly increase the population of Patterson, and in the process shift the distribution of the population and accelerate the rate of population growth.

The vast majority of the new housing development and therefore population growth will occur in the areas surrounding the existing city limits. This represents a shift in the distribution of the city's population.

Table II-4 summarizes the population potential at buildout of the *General Plan*, based on assumptions listed in Chapter II. According to these estimates, the *Land Use Diagram* will support a total population of about 30,798 residents, including approximately 21,623 new residents.

Population growth in Patterson will be determined by market conditions, the ability to finance and expand infrastructure to support new residential growth consistent with the *General Plan*, and population targets set forth in the *General Plan*.



## **2. General Plan Policy Response**

The following policies address the general population-related implications of the *Land Use Diagram*.

I.A.2. Growth in Patterson shall be planned and guided consistent with the following population limits and land use principles:

- Population limit of 17,000 residents by the end of the seventh year.
- Population limit of 19,000 residents by the end of the fifteenth year.
- Population limit of 21,000 residents by the end of the twentieth year.
- Concentrate community commercial, high-density residential, and public facilities uses in the downtown area and its western extension.
- Emphasize a mixture of residential types and densities.
- Ensure that ample buffers are established between incompatible land uses.
- Provide for an orderly sequence of development based on the logical extension of public facilities and services. Projects which extend such facilities and services shall be given priority in the allocation of growth, consistent with the target population levels set forth above, and shall be afforded such assurances (e.g., development agreements) as may be necessary to ensure that future facilities and service are adequate and properly extended.

I.A.4. The City shall link the rate of growth in Patterson to the provision of adequate services and infrastructure, including schools. The City shall, through specific plans and/or planned unit development plans for major projects, ensure that growth occurs in an orderly fashion and in pace with the expansion of public facilities and services.

I.A.5. The City shall monitor residential and non-residential development and encourage adjustments as necessary in land use designations and the rate of project approvals to promote a reasonable citywide balance between new employment-generating development and housing development and to minimize traffic impacts.

## **3. Impacts**

The effects of the *General Plan* on population will be substantial. These impacts are, however, deemed to be not significant for the purposes of CEQA. For CEQA purposes, population growth does not in itself result in direct *environmental* impacts. The environmental impacts occur primarily as changes in land use affect valuable *environmental* resources, such as prime agricultural land or wildlife habitat. The secondary and tertiary impacts of population growth are discussed in subsequent chapters of the *EIR*.

Furthermore, CEQA does not require that economic or social impacts be assessed as significant or potentially significant *environmental* impacts (*State CEQA Guidelines*, §15131).

## **4. Mitigation Measures**

None required.

## CHAPTER IV

### TRANSPORTATION AND CIRCULATION

#### A. INTRODUCTION

This chapter reviews the impacts of the *General Plan* on the Patterson-area transportation and circulation system, with the primary emphasis on the street and road network within Patterson. Existing transportation facilities and services are described in Chapter V of the *General Plan Background Report*.

#### B. STREETS AND ROADS

##### 1. Implications of the General Plan Land Use Diagram

To assess the potential impacts of the *General Plan* on the existing and proposed street and highway system of the Planning Area, the traffic consultant developed a computerized travel demand forecasting model. The model estimates daily travel demand, using the assumptions of the *Land Use Diagram* as input. The model estimates the trip generation levels, estimates the distribution of trips within the Planning Area and to the Planning Area entry/exit points, and estimates the assignment of trips to individual routes between their origins and destinations.

##### Model Assumptions

A key component of the traffic model is a representation of the existing and future street system. This is a mathematical approximation of the street system, which defines each link of the system by a node number at either end of the link, speed on the link, distance of the link, the number of lanes on the link and their capacity, and other parameters used by other components of the model in the processing of the network.

The model network includes all significant streets and roadways within the Planning Area. Most local streets are represented as access points from zones to collectors or arterials. Zones are discrete geographic subareas of the Planning Area, which the model uses to represent development, and which generate trips within the model.

Another key component of the model is a comprehensive description of the type, quantity, and location of existing and future development within the Planning Area. For existing conditions, the land use information was taken from a parcel-specific land use inventory conducted as part of the General Plan program. Future land use assumptions are those of the *Land Use Diagram*. All development is assigned to a zone within the model. The model includes about 120 zones, which isolate areas or neighborhoods with similar land uses and similar accessibility to the major street facilities. There are also 10 cordon stations (similar to zones) at the periphery of the model, which approximate the entry/exit points of the Planning Area.

##### Model Functions

There are three major functions performed by the model when it is run, including trip generation, trip distribution, and trip assignment.

Trip generation involves estimating the daily traffic generation for each zone in the network. This is done by applying trip generation equations to the land uses assumed to be located in each zone. The equations were developed by the traffic consultant specifically for this model of the Patterson Planning Area. They are based on trip generation rates widely accepted in the traffic engineering profession, and convert the land use parameters of the *Land Use Diagram* to estimates of daily trip generation.

Trip distribution involves an iterative process of estimating the destination of trips produced in each zone. The procedure estimates how many of the trips generated by a given zone (or cordon station) will travel to each other zone in the model. The distribution of trips from a given zone to other zones is directly proportional to the amount of trips generated by the other zones and inversely proportional to the distance from the given zone to the other zones. This is called a gravity distribution model, because this is similar to the mathematical formula for gravitational forces between two bodies. This distribution process is repeated three or more times until the results produced provide good overall estimates of the number of trips entering and leaving each zone.

There are also trips in the system that do not interact with the land uses in the model area. These include external-to-external (or through) trips, which enter the system at one cordon station and leave the system at another cordon station, without entering one of the model's internal zones. These trips are not a part of the gravity distribution process, but are estimated separately and added to the results of the gravity process.

Trip assignment is the process by which the generated trips are actually assigned to the various roadway links of the model. The model finds the shortest travel time path between the origin and the destination for each trip and then adds the trip to each link along that route. Multiple iterations are used to take into account the amount of congestion which is estimated to exist on the various links. This is typically referred to as a capacity restraint assignment process. When congestion becomes significant along a given route, the model looks for any alternate routes which will provide shorter travel times due to less congestion, and assigns trips to those routes instead.

The results of this three-stage modeling process is an estimate of the daily traffic volume on each link of the network and an indicator of the probable level of congestion during peak hours, given the number of lanes on the link and their peak hour capacities.

## **Model Calibration**

Model calibration is the process of verifying the accuracy of the model. The model used in analyzing the traffic impacts of the *Land Use Diagram* was calibrated to provide an acceptable approximation of the traffic volume levels on the Planning Area's existing roadway network. The existing daily traffic volume levels are presented in Chapter V of the *General Plan Background Report*. The calibration process involved several complete runs of the model, each run followed by adjustments to one or more of the following key assumptions: trip generation equations, internal/external distribution, individual link speeds or capacities.



## Future Traffic Conditions

The calibrated existing model was the basis for the future case traffic model. To the existing model were added additional roadway links and zones to fully represent the *Land Use Diagram* and the *Circulation Plan Diagram* (included in the *General Plan Policy Document*).

The links added to the roadway network include new roadways to provide access to future development areas and new roadways to provide regional circulation and access. The model includes representation of future collectors, arterials, and expressways as depicted on the *Circulation Plan Diagram*.

After hearings on the *Draft General Plan Policy Document* and the *Draft Environmental Impact Report* (DEIR), the City Council gave policy direction to the consulting team on several land use and circulation issues. Generally, these included deletion of some areas from the Planning Area, changes in land use designation for some areas, and decisions on some key circulation system features. The major circulation system decisions included the abandonment of the section of Ward Avenue between West Las Palmas Avenue and Ninth Street, the improvement of the connection between Orange Avenue and Highway 33 at Sperry Avenue, and the relocation of the southern bypass expressway farther to the south (between Bartch Avenue and Elfers Road).

With the modifications to the land use assumptions and the roadway network included, the future traffic model was again run. The results of this model are presented in Figure IV-1, which shows the projected future daily traffic volumes with the development of the *Land Use Diagram*.

For the purposes of this analysis, it was assumed that all of the development shown on the *Land Use Diagram*, including the reserve residential areas, would occur by the year 2011. This assumption provides the information necessary to evaluate the traffic impacts of the *Land Use Diagram*, but may not actually occur. Factors which may work against complete development by 2011 include non-uniform absorption rates for the various land uses and an imbalance in the amount of growth projected for the different land categories. To illustrate the latter factor Table IV-1 is provided, showing the model's assumptions about total development within the Planning Area by generalized land use categories.

TABLE IV-1

**PLANNING AREA GROWTH\***  
**BY GENERALIZED LAND USE CATEGORIES**  
**(Total Land Use: Existing Plus New Development)**

Land Use Categories	Existing	Future	Growth Factor
Residential dwellings**	2,908	11,950	4.1
Commercial/office/service acres	38	315	8.3
Industrial acres	96	575	6.4

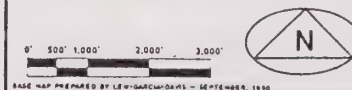
\* From the land use assumptions used in the traffic model

\*\* Future includes about 860 dwellings in the reserve area

This tabulation reveals that while residential development will increase by a factor of 4.1, the non-residential categories will increase in the range of 6.4 to 8.3 times. This means that the City will not grow in a manner proportional to the existing land use mix, but in the future it will have a proportionately greater amount of nonresidential development than it now has. To the extent that nonresidential development within the Planning Area out-strips residential development, residential concentrations outside of the Planning Area may be the only source to balance the economic and traffic levels produced by the additional nonresidential development.

The *General Plan Policy Document* establishes the following level of service criterion: "The City shall endeavor to maintain a Level of Service "C" . . . on all streets and intersections within the city" (Policy III.A.2.). Accordingly, the future roadway network needs to provide adequate capacity (enough lanes) to ensure that this criteria is met.

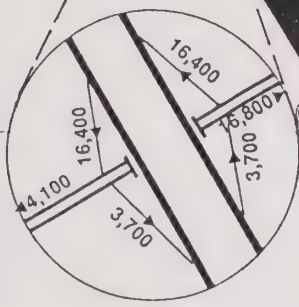
Generally, the daily capacity of streets within the Planning Area can be estimated by the data provided in Table IV-2. Using these capacities as guidelines, the future roadway network was sized to provide Level C or better peak hour conditions at full buildout.



# City of Patterson

**FIGURE IV-1**  
**DAILY TRAFFIC**  
**VOLUMES AT**  
**BUILDOUT**

- Local Street
- - - Collector
- Arterial
- Expressway\*
- Freeway



\*General alignment corridor. Precise alignment will be determined upon further study





**TABLE IV-2**  
**ROADWAY CAPACITIES BY LEVEL OF SERVICE**  
**(Average Daily Traffic Volumes)**

Roadway Type	----- Peak Hour Level of Service -----		
	<u>"C"</u>	<u>"D"</u>	<u>"E"</u>
City Street	V/C=0.71-0.80	V/C=0.81-0.90	V/C=0.91-1.00
Two-lane	11 - 12,000	12 - 13,000	13 - 15,000
Four-lane	21 - 24,000	24 - 27,000	27 - 30,000
Six-lane	32 - 36,000	36 - 40,000	40 - 45,000
Expressway	V/C=0.71-0.80	V/C=0.81-0.90	V/C=0.91-1.00
Two-lane	14 - 16,000	16 - 18,000	18 - 20,000
Four-lane	28 - 32,000	32 - 36,000	36 - 40,000
Six-lane	42 - 48,000	48 - 54,000	54 - 60,000
Freeway	V/C=0.66-0.85	V/C=0.86-0.95	V/C=0.96-1.00
Four-lane	53 - 68,000	68 - 76,000	76 - 80,000
Six-lane	79 - 102,000	102 - 114,000	114 - 120,000

Source: Joseph R. Holland, Consulting Traffic Engineer, 1992

## 2. General Plan Policy/Circulation Plan Response

In accordance with Policy III.A.2. of the *Policy Document*, the lane requirements of the future roadway network were determined so that acceptable peak hour traffic conditions will be provided. Using the capacity guidelines provide in Table IV-2, the future roadway network was sized to attempt to provide Level C peak hour conditions with the traffic projected by the model at buildout. The reserve areas were included in these facility sizing estimates.

Comparison of the projected daily traffic volumes presented in Figure IV-1 with the roadway capacities of Table IV-2 produced the recommended lanes for the major streets of the Planning Area's circulation network. Widening of some key roadway segments and development of a new four-lane southern bypass roadway are required to achieve the level of service goal of the *Policy Document*. Figure IV-2 shows the travel lanes recommended for the roadways serving the Planning Area at buildout of the *General Plan*.

In some instances, even these recommended facilities will not keep peak hour conditions from creeping slightly into the Level D range. Further roadway widening in these cases, however, is not believed to be cost-effective for the relatively small incremental mitigation required to bring them within the Level C range. Those locations where the model projects Level D peak hour conditions are as follows:

- Interstate 5 north of the Sperry interchange
- Sperry Avenue from Ninth Street to Highway 33
- Ward Avenue between Ninth Street and M Street

### Roadway Widths

The following roadways are shown with ultimate width of four or six travel lanes (turning lanes will be needed in addition to travel lanes):

#### Four Lanes

- E. Las Palmas Ave - Second St (Highway 33) to Sycamore Ave
- E. Las Palmas Ave - Sycamore Ave to Southern Bypass Road
- M Street - First Street to Ward Avenue
- Rogers Road - north of Sperry Avenue
- Second St (Highway 33) - M St to Southern Bypass Road
- Sperry Ave - Second St (Highway 33) to Southern Bypass Road
- Sperry Ave - Highway 33 to Locust Avenue
- Southern Bypass Road - E. Las Palmas Ave to Sperry Ave
- Ward Ave - Ivy Ave to Ninth Street
- Ward Ave - Sperry Ave to W. Las Palmas Ave

#### Six Lanes

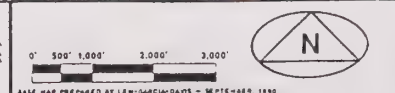
- Sperry Ave - Southern Bypass Road to Interstate 5 (to ensure attainment of the Level of Service C standard of the *Policy Document*, this road should function as an expressway facility as described below)
- E. Las Palmas Ave - east of the Southern Bypass Road

### New Southern Bypass Expressway

The traffic volume demands which would result at buildout of the *Land Use Diagram* are such that the new southern bypass roadway should be planned as a four-lane facility from E. Las Palmas Avenue to Sperry Avenue. The section of Sperry Avenue from the new bypass roadway to Interstate 5 should be planned as a six-lane facility.

The entire length from E. Las Palmas to I-5 should be planned as an expressway, rather than a conventional arterial. The kind of expressway envisioned differs from an arterial primarily in that direct access (driveways) to abutting properties is prohibited. All access to the expressway is provided only at intersections with collectors and arterials, which are signalized and well-spaced (ideally at least quarter-mile spacing). This expressway concept is consistent with the recommendations of the regional expressway study recently prepared by the Stanislaus Association of Governments (SAAG). The SAAG





# City of Patterson

FIGURE IV-2

## TRAVEL LANES NEEDED TO MAINTAIN LOS C AT BUILDOUT

- Local Street
- - - Collector
- Arterial
- Expressway\*
- Freeway

\*General alignment corridor. Precise alignment will be determined upon further study



study recommendations and the concept of an expressway are discussed further in a later section of this chapter.

If the Southern Bypass Roadway is not constructed, the peak hour traffic conditions on Sperry Avenue, Highway 33, and E. Las Palmas Avenue will be in the Level E and F ranges. A new connection between Highway 33 and Orange Avenue would receive some usage, but it will not attract excessive amounts of traffic unless it is improved to a very high design standard and travel speed (greater than 35 mph).

### **Intersection Signalization**

Based on the projected total daily traffic volume entering the intersection, major intersections which are likely to need signalization include the following:

- E. Las Palmas Avenue and Second Street (Highway 33)
- E. Las Palmas Avenue and First Street
- E. Las Palmas Avenue and Hartley Street
- Sperry Avenue and Second Street (Highway 33)
- Sperry Avenue and Del Puerto Avenue
- Sperry Avenue and Ward Avenue
- Sperry Avenue and W. Las Palmas Avenue
- Sperry Avenue and Southern Bypass Roadway
- Sperry Avenue and Baldwin Road
- Sperry Avenue and Roger Road
- Sperry Avenue and I-5 Northbound Ramps
- Sperry Avenue and I-5 Southbound Ramps
- W. Las Palmas Avenue and Ward Avenue
- Ward Avenue and Ninth Street
- Ward Avenue and M Street

At the planning level detail of this analysis, it is not possible to foresee all intersections which may eventually need signalization. It is possible that 10 or 12 other intersections in the Planning Area's 2011 roadway network may need signalization.

New commercial and industrial collectors in Subarea B (highway service commercial) and Subarea D (light industrial) will each require a four-lane collector providing access and connection to Sperry. The volume of traffic which could potentially be generated by the land uses in these areas necessitate these collectors.

### **Interchange Improvements**

In addition to the signalization of the ramp intersections, other improvements will be needed at the I-5/Sperry Avenue interchange. The northbound on-ramp and the southbound off-ramp will both need to be widened to provide two lanes, to adequately accommodate the projected traffic volumes at buildout. Additionally, widening will be needed on Sperry Avenue under the freeway, between the two ramp intersections to adequately accommodate peak hour turning and through traffic movements. With its existing four-lane mainline width, Interstate 5 will operate within the Level D range north of Sperry and Level C or better south of Sperry.



At the intersection of Highway 33 and the new southern bypass roadway, the projected traffic volumes can be adequately accommodated by either an at-grade intersection or a grade-separated interchange. The at-grade intersection will be somewhat complicated by the close proximity of the Southern Pacific Railroad. This would be similar to the condition which now exists (and will continue to exist) at the East Las Palmas Avenue and Highway 33 intersection. A grade-separated interchange would require a greater amount of right of way (probably on the west side of Highway 33) for provision of the necessary ramps. A grade-separated interchange may prove to be infeasible due to excessive cost and/or unavailability of rights of way for the ramps.

### **New Diagonal Road North of Extended Downtown**

To facilitate the circulation needs of the extended downtown area, a new diagonal collector is recommended along the northern side of the extended downtown area. This will provide a connection between Ward Avenue and Sperry Avenue and relieve some pressure on Sperry Avenue. This should be a four lane facility.

### **General Plan Policies**

In addition to the improvements described above, the *General Plan Policy Document* includes the following policies to address traffic concerns:

- III.A.1. Street design and access standards shall provide for safe and efficient movement of goods and people. Restrictive traffic control measures (such as channelization, street closures, and prohibition of some traffic movements) shall be used where appropriate to promote traffic safety and efficient traffic operation.
- III.A.2. The City shall endeavor to maintain a Level of Service "C", as defined by the *1985 Highway Capacity Manual* or subsequent revisions, on all streets and intersections within the city. To identify the potential impacts of new development on traffic service levels, the City shall require the preparation of traffic impact analyses at the sole expense of the developer for developments determined to be large enough to have potentially significant traffic impacts.
- III.A.3. Streets shall be dedicated, widened, extended, and constructed according to City standards. Dedication and improvements of full rights-of-way shall not be required in existing developed areas where the City determines that such improvements are either infeasible or undesirable. Other deviations from these standards shall be permitted upon a determination by the City Engineer that safe and adequate public access and circulation are preserved by such deviations.
- III.A.4. Neighborhood streets shall be designed, where feasible, to discourage unsafe traffic speeds.
- III.A.5. The City shall promote development of an expressway to facilitate east-west travel and to divert through-traffic from Sperry Avenue and East Las Palmas Avenue. The general alignment of the expressway shall connect with Sperry Avenue in the western portion of the Planning Area, follow an alignment south of the existing city limits, and connect to East Las Palmas Avenue near the eastern edge of the Planning Area. In studies of expressway design, a separation of grades between vehicular and train traffic shall be considered.

- III.A.8. The primary purpose of streets outside the downtown and its western extension shall be the movement of vehicles and goods; parking shall be a secondary and subordinate use only. If travel demands dictate, on-street parking may be removed to increase traffic-carrying capabilities.
- III.A.9. On-street truck parking shall be prohibited where such parking restricts adequate sight distances or otherwise poses a potentially hazardous situation.
- III.A.10. Industrial and commercial development shall be planned so that truck access through residential areas is avoided.
- III.A.11. The City shall ensure through a combination of traffic impact fees and other funding mechanisms that new development pays its share of the costs of circulation improvements. The total cost of required improvements shall be paid for by new development.
- III.A.12. The City shall prohibit development of private streets in new residential projects, except in extraordinary circumstances. In such cases, the private streets shall be developed to City street standards.

Several other policies in the *General Plan Policy Document* would also work to lessen the impacts of new development on the Planning Area roadway system. These include:

- III.C.1. The City shall encourage and support programs which will increase ridesharing.
- III.C.2. The City shall cooperate with Caltrans in the development of park-and-ride facilities near Interstate 5.
- III.C.3. The City shall organize a voluntary ride-share coordination system for commuters.

### 3. Impacts

With the improvements included in the *General Plan* and the *Circulation Plan Diagram*, all but a few roadways are expected to remain within the *Policy Document* level of service standard for peak hour traffic conditions. In some instances, however, even the recommended improvements will not keep peak hour conditions from creeping slightly into the Level D range. Those locations where the model projects Level D peak hour conditions are as follows:

- Interstate 5 north of the Sperry interchange
- Sperry Avenue from Ninth Street to Highway 33
- Ward Avenue between Ninth Street and M Street

While Level D exceeds the *Policy Document's* standard, this level of congestion still represents free flowing traffic conditions, but with increased delay and greater limitations on maneuverability. Many communities use Level D as their service level planning criteria. Therefore, the fact that a few locations will have peak hour conditions within the Level D range generally would not represent a severe adverse



environmental impact. Since it exceeds the *General Plan's* Level of Service C standard, however, it is considered a significant impact.

A second area where a potentially significant impact on traffic results concerns the southern bypass expressway. As part of the County's proposed expressway system, the City is intending to rely to a large extent on the funding mechanisms outlined in the *Expressway Study* for its construction, including a proposed County sales tax increase. Since the City cannot guarantee the success of these funding mechanisms, or whether development of the Patterson expressway will be a high priority for the County, the possibility exists that it will not be built within the time frame of the *General Plan*. Without the southern bypass expressway (with only the Sperry Avenue-Orange Avenue improvements), the Level of Service along Sperry reaches E and F. This therefore represents a potentially significant impact.

#### **4. Mitigation Measures**

With implementation of the improvements included in the *Policy Document* and the roadway system of the *Circulation Plan Diagram*, no further mitigation measures are expected to be required, with the exception of those roadway segments identified as exceeding Level of Service C. Roadway improvements to improve the level of service at these areas could be undertaken; however, further roadway widening in these cases, however, is not believed to be cost-effective for the relatively small incremental mitigation required to bring them within the Level C range.

Concerning the possibility that the southern bypass expressway will not be built within the time frame of the *General Plan*, mitigation of this impact would be to guarantee full City funding of the expressway, although this would probably not be economically feasible. Another way to reduce this potential impact would be to include language to work with the County in developing funding for the southern bypass expressway, including City participation, and to promote its development within the time frame of the *General Plan*. The following policies were included in the adopted *General Plan*:

- III.A.6. The City shall work with the County in developing funding for the southern bypass expressway, including consideration for some City participation.
- III.A.7. The City shall promote development of the southern bypass expressway within the time frame of the *General Plan*.

#### **5. Regional Plan Consistency**

The Stanislaus Area Association of Governments (SAAG) completed a countywide expressway study. This study, prepared by Fehr & Peers in consultation with the SAAG Expressway Advisory Committee, the SAAG Technical Committee, and the SAAG Policy Board, recommends a comprehensive system of expressways. The study defines an expressway as "an arterial highway with at least partial control of access, which may or may not be divided or have grade separations."

The expressway system recommended by the SAAG *Expressway Study* includes a four-lane expressway along the south side of Patterson, approximately where the new southern bypass roadway is shown on the *General Plan Circulation Diagram*. The kind of expressway proposed by the SAAG study is described as having minor access restrictions, but allowing left-turns to and from occasional collectors. Major streets are signalized, with 55 percent to 65 percent of the green time allotted to the



a major arterial, but the access controls and preferential treatment at intersections gives it about 20 percent more capacity than an arterial with the same number of lanes. Right-of-way width required for this type of expressway is about 110 feet.

The SAAG study states that the city of Patterson would benefit from a bypass of East Las Palmas Avenue and the downtown area. It also states that the maximum facility that might be needed by the year 2011 is a four-lane expressway. The study shows the recommended expressway with a generalized alignment which swings south of the existing city area, connecting on the east with E. Las Palmas Avenue at some point west of the San Joaquin River, and connecting on the west with Sperry Avenue at some point west of Ward Avenue. It is shown extending all the way to Interstate 5, with a possible upgrade of the I-5/Sperry interchange.

The findings presented earlier in this chapter confirm the recommendations of the SAAG study. Development under the *General Plan* as shown in this *EIR* indicates a four-lane facility on the new southern bypass roadway from E. Las Palmas Avenue to Sperry Avenue and a six-lane facility on Sperry Avenue between the bypass's western connection and Interstate 5. The six lanes along Sperry Avenue exceeds the recommendations of the SAAG study. The reason for this is the higher development intensity represented in the *General Plan Land Use Diagram* than that previously assumed in the regional transportation model used for the SAAG study. Table IV-3 shows how the population and employment levels differ.

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TABLE IV-3  
CITY OF PATTERSON DEVELOPMENT LEVELS  
2010

	SAAG Expressway Study	General Plan Land Use Diagram
Population	19,100	21,000
Total Employment	6,200	15,000

---

Thus, the finding of this chapter that a six-lane facility will be needed on Sperry Avenue between the west end of the new southern bypass roadway and I-5 is understandable, due to the higher population levels and the higher employment levels possible at buildout of the *General Plan Land Use Diagram*.

### C. OTHER TRANSPORTATION FACILITIES AND SERVICES

In addition to streets and roads, several other transportation facilities and services will be affected by the *General Plan*, most importantly public transportation. These basic services are addressed in Chapter V of the *General Plan Background Report*.

## **1. Implications of the General Plan Land Use Diagram**

### **Public Transportation**

The only form of public transportation currently available in Patterson is through West Side Dial-a-Ride, a County-operated van service which offers travel Monday through Friday from Patterson to other communities in western Stanislaus County and service to Modesto on Thursdays. The Senior Opportunity Service Program offers local transportation to the elderly in Patterson. Because development under the *General Plan Land Use Diagram* would result in significant population and job growth within Patterson, the demand for all types of transportation facilities, including public transportation, would increase.

## **2. General Plan Policy Response**

### **Public Transportation**

Several specific policies included in the *General Plan* address the need for public transportation to respond to new growth. These include the following:

- III.B.1. The City shall work to assure that West Side Dial-a-Ride service is responsive to local needs.
- III.B.2. The City shall work with the County to maintain a van/minibus transportation system tailored to the needs of the elderly and disabled, which can be expanded in the future.
- III.B.3. The City shall encourage the establishment of private taxi service in Patterson.

### **Pedestrian and Bicycle Travel**

- III.G.1. The City shall create and maintain a safe and convenient system of pedestrian and bicycle pathways that encourages walking or bicycling as an alternative to driving. New development shall be required to pay its share of the costs for development of this pathway system.
- III.G.2. The City shall establish a safe and convenient network of identified bicycle routes connecting residential areas with recreation, shopping, and employment areas within the city. The City shall cooperate with surrounding jurisdictions in designing and implementing an areawide bikeway system.
- III.G.3. Bicycle routes shall emphasize paths separated from vehicle traffic to the maximum extent possible, but shall also include bicycle lanes within public streets. The City shall limit on-street bicycle routes to those streets where the available roadway width and traffic volumes permit safe coexistence of bicycle and motor vehicle traffic.
- III.G.4. To the extent practicable, bicycle and pedestrian pathways shall be included within open space areas.
- III.G.5. The City shall require inclusion of bicycle parking facilities at all new major public facilities and commercial and employment sites.

III.G.6. Bicycle safety shall be considered when implementing improvements for automobile traffic operations.

### **3. Impacts**

The *General Plan Policy Document* includes policies to encourage the expansion of public transportation and bicycle and pedestrian travel in Patterson. The *General Plan* would not result in any significantly adverse impacts on other transportation services and facilities.

### **4. Mitigation Measures**

None required.





## CHAPTER V

### PUBLIC FACILITIES AND SERVICES

#### A. INTRODUCTION

This chapter assesses the impacts of the *General Plan* on water, wastewater, drainage, police, and fire facilities and services, schools, medical services, solid waste collection and disposal, library service, and utilities in Patterson. Existing public facilities and services are described in Chapter VI of the *General Plan Background Report*.

#### B. WATER

The City is the primary provider of domestic and commercial water service to customers within the Planning Area. The City's source of water supply is currently groundwater. In addition to the City's water system, Patterson Frozen Foods has its own water system that utilizes groundwater, and residents in the unincorporated areas rely on private wells for water supply.

The City will continue to increase its use of groundwater to serve demands associated with growth in the Planning Area. Currently the City's groundwater wells operate at approximately 50 percent of their combined capacity during peak months. Additional groundwater wells will be added to the City's system in the future to accommodate the future increase in water demand. Based on review of research and data prepared by the U.S. Geological Survey and the California Department of Water Resources concerning groundwater in the Patterson area, it appears that groundwater supplies can adequately meet the increase in water demands projected to occur within the Planning Area.

In the event that groundwater supply or quality is not adequate, the City is also currently pursuing the opportunity to secure an alternative source of water supply. The Planning Area includes agricultural lands that are currently served by the Patterson Water District, West Stanislaus Irrigation District and the Del Puerto Water District. These districts each obtain a portion, if not all, of their surface water supplies from the Delta-Mendota Canal. As lands within the Planning Area are converted from agriculture to urban use, a portion of the previously used agricultural surface supply may become available for domestic supply. The City is currently negotiating with the surrounding water districts and the U.S. Bureau of Reclamation to acquire these water rights as they become available. Water supplied from the Delta-Mendota Canal will require treatment prior to delivery as drinking water.

##### 1. Implications of the General Plan Land Use Diagram

The implications of the *General Plan Land Use Diagram* on the City's water supply and system were analyzed by applying unit water use factors to the development potential included in the *General Plan*.

The following unit water use factors were used to project average water demand at full buildout of the *General Plan*:

Residential	145 gallons/capita/day
Commercial	3.0 acre-feet/acre/year
Industrial	
Light	2.0 acre-feet/acre/year
Heavy	3.0 acre-feet/acre/year
Public/Quasi-Public	3.0 acre-feet/acre/year
(schools, hospitals, churches, etc.)	

The unit usage factors were applied to the land uses in the *Land Use Diagram* and the year 2011 population limit described in the *General Plan Policy Document*. Analysis was also performed to investigate water requirements associated with a population at full buildout of the Planning Area. Results of this analysis are shown in Table V-1 and indicate that average daily water use would be 5.4 million gallons per day (MGD) for the year 2011 population limit, and 6.8 MGD at full buildout of the Planning Area. This water demand equates to approximately 6,000 acre-feet per year and 7,600 acre-feet per year, respectively for the year 2011 and at full buildout.

**TABLE V-1**  
**WATER USE REQUIREMENTS**

	Population		Acreage		Unit Water Use Factor	Average Daily Water Use (gallons/day)	
	2011	Buildout	2011	Buildout		2011	Buildout
Residential	21,000	30,400			145 gpcd	3,045,000	4,411,300
Commercial			280	280	3.0 af/ac/yr	749,900	749,900
Industrial							
Light			504	504	2.0 af/ac/yr	899,900	899,900
Heavy			<u>82</u>	<u>82</u>	3.0 af/ac/yr	<u>219,600</u>	<u>219,600</u>
Subtotal			586	586		1,119,500	1,119,500
Other							
PQP			181	181	3.0 af/ac/yr	484,800	484,800
<b>Total</b>						<b>5,399,200</b>	<b>6,765,500</b>

Notes: Industrial acreage does not include Patterson Frozen Foods

af/ac/yr = acre-feet per acre per year

gpcd = gallons per capita per day

Source: Bookman-Edmonston Engineering, Inc.



Various factors are considered during the design of a water supply system. These factors include requirements for adequately providing capacity to meet peak water demands and consideration of requirements for fire protection. Typically, the average demand rate is multiplied by a peaking factor, then increased by a flow rate for fire protection to determine the required capacity of a water supply and distribution system. This approach was used in formulating infrastructure facilities that will provide a water supply system for development under the *General Plan*.

The City has prepared a *Water System Master Plan* for the Planning Area. Infrastructure facilities required within the *Water System Master Plan* include arterial water distribution pipelines, water storage tanks, pressure control devices and groundwater wells and pumps. Facilities included in the *Water System Master Plan* were sized to accommodate the full development of water use associated with the *Land Use Diagram* and will be interconnected to the City's existing water system facilities.

Figure V-1 illustrates a preliminary layout of water supply and distribution facilities. The specific location of wells, storage facilities and pipelines are subject to relocation so that the placement of infrastructure facilities will be consistent with specific development plans. The total cost associated with the *Water System Master Plan* is estimated to be \$18 million. Additional information and detail regarding the required water supply and distribution facilities associated with the *General Plan* can be found in the *Water System Master Plan*.

The combined capacity of the City's existing wells is adequate to satisfy the current water supply needs of the City's customers. However, due to undersized mains within the distribution system, recommended fire flows cannot be met. The City is currently interconnecting various portions of the water system to provide looping for the entire system and increase water pressure and volume in areas of deficient supply and pressure.

## 2. General Plan Policy Response

The following *General Plan* policies address the implications of development under the *General Plan* on the City's water supply and distribution system:

- IV.A.1. The City shall continue to use groundwater as a source of domestic water for the City. The City shall also pursue, as expeditiously as possible, acquisition of surface water rights to supplement its water supply in order to accommodate projected water demand and provide for water supply security.
- IV.A.2. The City shall expand and develop water treatment, distribution, and storage facilities to accommodate the needs of existing and planned development.
- IV.A.3. The City shall not approve any new development without the demonstrated assurance of an adequate water supply to support such development.
- IV.A.4. The City shall coordinate, to the extent feasible, with other agencies involved in water resource development in the region.

- IV.A.5. To minimize the need for the development of new water sources and facilities and to minimize sewer treatment needs, the City shall promote water conservation both in City operations and in private development.
- IV.A.6. The City shall systematically replace or repair old, leaking water lines.
- IV.A.7. The City shall ensure the provision of adequate fire-flows in all new development.
- IV.A.8. The City shall, through a combination of water development fees and other funding mechanisms, ensure that new development pays its share of the costs of water system improvements.

### **3. Impacts**

Water demand will increase due to development under the *General Plan*. This increase in water demand will require additional development of the City's groundwater supply. Based on current data, it appears that groundwater supplies will adequately meet this increase in water demand.

As a supplemental source of water supply, the City is pursuing the acquisition of the surface water supplies that are currently being used by agricultural lands within the Planning Area. Currently available information indicates that the water usage per acre associated with agricultural use and mixed urban use are comparable. Therefore, if the surface water supply is acquired and utilized, no increase in water demand is anticipated for land whose water supply is converted from agriculture use to urban use.

In addition to requiring an increase in water supply, development under the *General Plan* will require expansion and extension of the City's water distribution system to provide service to areas not currently served. If the City is successful in securing a surface supply of water, a water treatment facility will be required.

Included in the *General Plan* are policies concerning water conservation and regional coordination of water resource development. Both policies provide the opportunity to reduce the impact on water supplies due to development under the *General Plan*.

The *Water System Master Plan* identifies water supply facility improvements needed to serve anticipated development under the *General Plan*. Facilities necessary to service existing water customers and anticipated growth can be constructed as necessary; therefore, the impact of the *General Plan* on the City's water supply and distribution system would be less than significant.

### **4. Mitigation Measures**

No mitigation measures are necessary other than adoption and implementation of the *Water System Master Plan* and associated funding mechanisms.

In coordination with mitigation measures that affect sewerage facilities, effluent reuse could be investigated as a measure to lessen impacts associated with an increase in water demands in the Planning Area.



**FIGURE V-1**  
**WATER DISTRIBUTION**  
**SYSTEM**



**LEGEND**

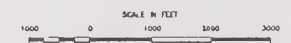
- FUTURE WELL SITE
- STORAGE TANK & BOOSTER PUMP
- ▲ EXISTING WELLS
- EXISTING PIPELINE
- NEW PIPELINE
- - - PLANNING AREA BOUNDARY

(Locations of All Future Facilities are Approximate)

BOOKMAN-EDMONSTON ENGINEERING, INC.

GLENDAL, CALIFORNIA

JANUARY, 1992







## C. WASTEWATER

The City provides wastewater collection, treatment and disposal service for all residents, schools, commercial and industrial establishments within the city except for Patterson Frozen Foods, which provides its own system.

### Description of Existing System

The existing collection system consists of gravity flow pipelines ranging in size from 6-inch to 18-inch diameter and generally located within City street rights-of-way. The older portion of the system, which generally serves the downtown core residential and commercial area, was constructed before 1960. Newer developments have been connected to this system as they have occurred.

The free flow capacity of the 18-inch trunk pipeline extending along Walnut Avenue to the treatment facilities is 3.5 million gallons per day (mgd) throughout most of its 13,000 foot length. The last 2,000 feet of this pipeline is rated at 2.7 mgd.

City treatment and disposal facilities consist of influent pumping, oxidation ditch activated sludge processing, disinfection, peak flow diversion and disposal ponding, and an outfall to the San Joaquin River. The City is permitted a year-round secondary level discharge to the river, but in practice, all effluent is applied to land via the pond system. The ponds also receive system flows that exceed treatment plant hydraulic capacity.

The existing treatment capacity is 1.0 mgd on an average dry weather flow (ADWF) basis, and approximately 2.0 mgd on a peak wet weather flow (PWWF) basis. The annual average evaporation/percolation disposal capacity of the pond system is about 0.5 mgd, based on peak wet season conditions as occurred in 1982/83 and 1985/86. Disposal of effluent to land via the ponds has continued without overloading because of the dryer than normal wet seasons experienced in recent years.

The capacities of critical wastewater system components are therefore summarized as follows:

Trunk Sewer PWWF Capacity	3.5 mgd
ADWF Treatment Capacity	
Aerated Ponds	1.0 mgd
Activated Sludge System	1.0 mgd
Effluent ADWF Disposal Capacity	
Pond System (evap/perc)	0.5 mgd
Discharge to San Joaquin River	1.0 mgd

Wastewater flows in 1990 averaged about 0.73 mgd during dry weather months. An estimated breakdown of the sources of this flow is as follows:

Residential	0.65 mgd
Commercial	0.06 mgd
Industrial	0.02 mgd
<b>Total</b>	<b>0.73 mgd</b>

The current served residential population is about 8,900, which indicates a unit wastewater flow of about 73 gallons per person per day. This rate of flow and the total average flow for the system is reasonable for a community with a residential/commercial mix such as Patterson.

Peak system flows are estimated to slightly exceed 4.0 mgd, which is the accuracy limit of influent flow measuring equipment. A considerable volume of extraneous flow enters the wastewater system during wet weather periods, principally as inflow. While the pond system provides adequate holding capacity for peak flows, the collection system capacity limits the conveyance potential at present. The City administers an on-going system maintenance program, an objective of which is the identification and elimination of extraneous flow sources.

Patterson Frozen Foods owns and operates a separate conveyance treatment and disposal system for its industrial wastewater. Treatment is provided in aerated lagoons with disposal of effluent by spray irrigation on land located north of the city.

### 1. Implications of General Plan Land Use Diagram

The *General Plan Land Use Diagram* provides for significant growth of residential, commercial, and industrial development in the Planning Area. Existing wastewater flow generation within the city reflects a slight net out-migration of residents during the normal workday. As the community develops, more general commercial activity is expected to result in an increased per capita flow contribution in the system.

For planning purposes, the following engineering criteria are applied for future growth:

#### Average Dry Weather Wastewater Flow (ADWF):

Residential (per capita)	80 gal/day
Commercial (per acre)	2,000 gal/day
Industrial (per acre)	
Light	1,500 gal/day
Heavy	2,500 gal/day
Wet Weather Peaking Factor	
Existing Developed Area	4.0 (a)
New Development	2.5
Wastewater Characteristics	
BOD	220 mg/l
Suspended Solids	220 mg/l

(a) Reduction from current peaking factor of about 6 due to assumed I/I elimination.

The above characteristics are fairly typical of a moderate strength domestic wastewater. Factors which support use of such criteria for planning purposes are as follows:

- Patterson Frozen Foods wastewater is to be handled separately from the City's wastewater.



- Commercial and industrial wastewater discharges to be subject to ordinances limiting contaminants incompatible with treatment facilities suitable for domestic wastewater.

Estimated future wastewater flows within the Planning Area at various development stages, including full buildout, are presented in Table V-2.

**TABLE V-2**  
**PROJECTED WASTEWATER FLOWS AND LOADS**

Parameter	Current	Projected Conditions (a)			
	1990	1998	2006	2011	Buildout
Population	8,900	17,000	19,000	21,000	30,800
Flow					
ADWF (b)	0.73	1.90	2.35	2.75	4.0
PWWF (c)	>4.0	7.0	8.0	8.8	12.2
BOD (d)					
mg/l	220	220	220	220	220
lbs/day	1,410	3,490	4,310	5,050	7,340
Suspended Solids					
mg/l	210	220	220	220	220
lbs/day	1,410	3,490	4,310	5,050	7,340

(a)Excludes Patterson Frozen Foods.

(b)Average dry weather flow.

(c)Peak wet weather flow.

(d)Biochemical oxygen demand.

Source: Dewante and Stowell, 1991

## 2. General Plan Policy Response

The following *General Plan* policies address the implications of increased wastewater flows:

- IV.A.5. To minimize the need for the development of new water sources and facilities and to minimize sewer treatment needs, the City shall promote water conservation both in City operations and in private development.

- IV.B.1. The City shall selectively repair or replace old sanitary sewers lines to eliminate or minimize infiltration/inflow.
- IV.B.2. The City shall ensure the provision of adequate sewer service to all new development in the city and support the extension of sewer service to existing developed areas where this service is lacking.
- IV.B.3. The City shall expand and develop new wastewater treatment and disposal capacity , which would include aerated pond treatment with evaporation/percolation disposal, to accommodate the needs of existing and planned development.
- IV.B.4. The City shall, through a combination of sewer development fees and other funding mechanisms, ensure that new development pays its share of the costs of sewer system improvements.

### **3. Impacts**

Development occurring before the City reaches its 1997 population cap will require expansion of the collection and conveyance system and the treatment and disposal facilities. Peak wastewater flows could be reduced in the existing system by repair and/or replacement of old sanitary sewers and elimination of sources of infiltration and inflow. Additional reduction of flows could be achieved through water conservation practices. While included as policy objectives, quantification of these potential flow reduction measures are nevertheless impracticable.

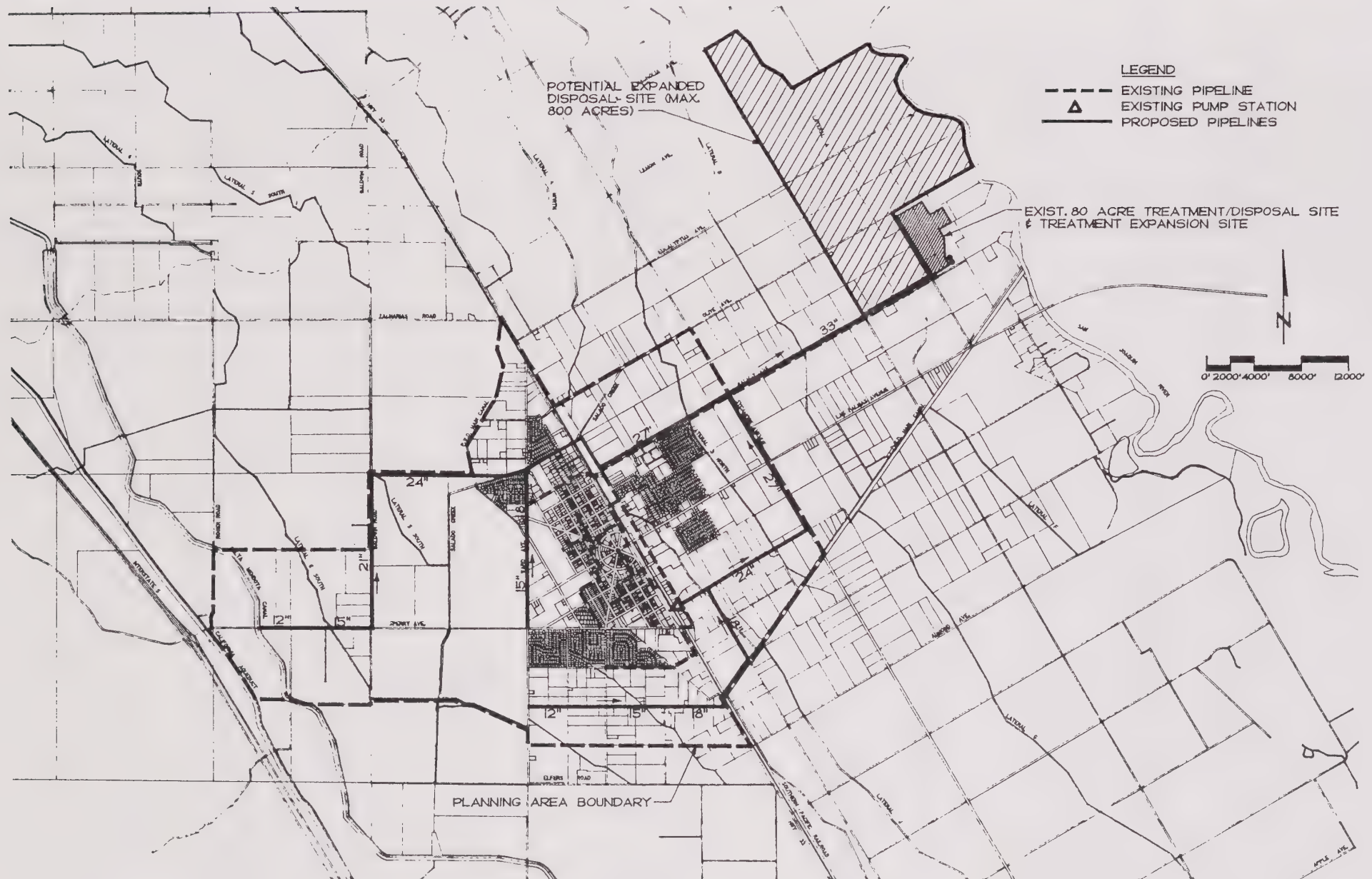
The *Wastewater Master Plan* provides an analysis and recommendations identifying the planned wastewater collection system and treatment and disposal facility improvements needed to serve projected development under the *General Plan*. Improvements needed to serve new development under the *General Plan* consist of collection system improvements and treatment and disposal facility improvements. Individual new developments of a small size and having a relatively minor impact on the existing system may be accommodated on a case by case basis subject to interim improvements. Generally, however, significant new development within the Planning Area will require substantial additions to the existing wastewater collection and conveyance system. Treatment and disposal facilities have adequate capacity for limited service area growth with minor modifications to improve operational performance and reliability.

The *Wastewater Master Plan* to serve development under the *General Plan* consists of the major system components shown in Figure V-2 and described as follows:

#### **A. Collection/Conveyance System**

- 1. New gravity flow trunk pipeline along Walnut Avenue, 27- to 33-inch size, to convey all new development flow to the treatment site.
- 2. New gravity-flow trunk pipelines, 12- to 24-inch size, collecting and conveying new development flows from westerly and northerly zones along Sperry Avenue, Baldwin Road and Ward Avenue corridors into the new Walnut Avenue trunk.

# WASTEWATER MASTER PLAN







3. New gravity-flow trunk pipelines, 12- to 24-inch size, collecting and conveying new development flows from southerly and easterly zones along Bartch Road, Orange Avenue, and Sycamore Avenue corridors into the new Walnut Avenue trunk; existing pump station near the intersection of First and Orange Avenues would be abandoned.
4. Gravity flow pipeline connections would be made into the above trunk lines as required to serve separate development areas, with oversizing provided to accommodate upstream development areas.
5. Existing collection system to be utilized for new development only on a case-by-case interim basis until above components become operational.

B. Treatment/Disposal System

1. Install new headworks and pump station facility to accommodate greater flow and new deeper influent trunk pipeline.
2. Expand existing pond treatment and disposal system in stages by deepening ponds and adding mechanical aeration equipment to accomplish treatment of up to an average flow of 3.1 mgd in about 40 acres of ponds on the existing 80 acre site;
3. Retain existing oxidation ditch facilities to provide treatment for about 0.9 mgd.
4. Construct in stages to accommodate flow increases about 650 acres of evaporation percolation disposal ponds on about 800 acres of City-purchased land near the existing site; precise location of ponds to be determined, but they are expected to be north of Las Palmas Avenue and at least 2500 feet northerly and easterly of the Planning Area; purchase of land and construction of ponds to be in stages as required to meet development demand and increased flows.
5. Retain the existing river discharge disposal capability as long as is cost effectively justifiable.

Collection system and treatment and disposal facility improvements will be constructed following a staging plan to insure that wastewater service is provided for new development in a cost effective manner.

The City will identify financing for all necessary improvements that can reasonably be assumed through a combination of sources and techniques. The *General Plan Policy Document* provides for the construction and financing of expanded treatment and distribution facilities to serve new development. The impact of the *General Plan* on the City's sewer collection and treatment system would, therefore, be less-than-significant.

Improvements could be planned to accommodate extension of wastewater service to Patterson Frozen Foods, which presently operates its own wastewater facilities. Funding of an expansion for this purpose would be provided entirely by Patterson Frozen Foods, at no cost to the City or any existing or other future users.

#### 4. Mitigation Measures

No mitigation measures are necessary other than adoption and implementation of the *Wastewater Master Plan* and associated funding mechanisms.

Although the impact of development under the *General Plan* is considered less than significant, the following mitigation measure could be included:

- Strengthen City ordinance provisions prohibiting or limiting discharge of wastes incompatible with treatment facilities suitable for domestic wastewater.

#### D. DRAINAGE

Storm drainage services are provided by the City of Patterson. Existing drainage and watershed areas are shown in Figure VI-6 in the *General Plan Background Report*.

##### 1. Implications of the General Plan Land Use Diagram

Future stormwater runoff was analyzed based on the increase in the amount of impervious surfaces resulting from development under the *General Plan*. The design of both existing and new drainage facilities are based on the Stanislaus County Drainage Standards.

The analysis of runoff from a storm over a given area involves the computation of flows and the routing of those flows through an existing or proposed system. This is done by using the "Rational Method." The Rational Method is the most widely used method for computing quantities of stormwater runoff with relatively uniform terrain. The equation for the Rational Method takes the form " $Q=CIA$ ," where:

- Q = Peak runoff in cubic feet per second (cfs);
- C = Composite runoff coefficient describing the portion of rainfall that occurs as runoff;
- I = Average intensity of rainfall in inches per hour, which corresponds to the basin's time of concentration; and
- A = Drainage basin area in acres.

The Rational Method assumes that rainfall occurs uniformly over the drainage basin, rainfall occurs uniformly over time, and peak runoff from the basin occurs when the entire basin is contributing to the runoff.

The selection of the proper runoff coefficient (C) is critical to the computation of stormwater runoff. Runoff is dependent on the slope, cover, and saturation of the drainage basin. The type of land uses within a basin affects the amount of runoff generated by a storm. Urban development can greatly increase runoff due to the covering of pervious area, such as dirt or fields, with impervious surfaces, such as roofs or pavement.

Runoff coefficients (C values) have been assumed for each land use designation shown on the *Land Use Diagram*. Each land use was considered to have a corresponding percentage of impervious surfaces, such as roofs or pavement. For instance, industrial areas would have a greater percentage than residential areas



because of the large areas of paved surface. The runoff coefficient reflects the portion of rainfall that will occur as runoff.

The changing of land uses can change the C value associated with an area. For example, the conversion of an agricultural area to an industrial area would entail covering of pervious surfaces, such as fields, with impervious surfaces, such as pavement. Rainfall can soak into fields at a much greater rate than into pavement. More runoff will, therefore, occur with an industrial use than with an agricultural use.

The land uses of an area will also affect the time it takes for runoff to reach the drainage outlet for the area. In generally flat areas (ground slope of less than one percent), paved areas drain faster than unpaved areas. This also affects the amount of runoff generated from an area by changing the intensity of the design storm chosen for that area.

Table V-3 indicates the runoff coefficients for various land use designations in the *General Plan*.

---

**TABLE V-3**  
**RUNOFF COEFFICIENTS**

**Basic Runoff Coefficients**

Surface	Coefficients
Pavement	0.95
Roofs	0.80
Compacted earth without paving	0.75
Lawns and Open Lands	0.1 - 0.2

**Composite Runoff Coefficients**

Land Use	Coefficient
Residential	
Low Density (Single Family)	.30
Medium Density (Multi-Family)	.50
Business and Commercial	.90
Industrial	
Restrictive Light	.80
General	.90

Source: Stanislaus County (Nolte and Associates)

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The *Stanislaus County Standards* provided guidelines for the selection of runoff coefficients. The intensity (I) of a storm, as modelled using the Rational Method, is related to the time of concentration of a drainage basin. Time of concentration is the time it takes for the runoff from the most remote point of a basin to reach the outlet of that basin. Thus, the entire basin is contributing runoff to the basin's outlet, maximizing the flow from the basin. The intensity of a storm is derived from an intensity-duration-frequency relationship for precipitation.

Under the *General Plan*, the area west of the current city limits to the Delta-Mendota Canal is designated for a mixture of commercial, industrial, residential, business park reserve, and quasi-public uses. These land uses have significantly higher C values than the open fields which presently cover this area. A small portion of the shed is already developed with an airport and scattered residential uses.

Runoff will increase by 650 cfs at full buildout of the *General Plan* due to the greater percentage of impervious surfaces.

## **2. General Plan Policy Response**

The following *General Plan* policies address the implications of increased drainage flows from development:

- IV.C.1. The City shall develop a long term solution for flooding related to Salado Creek and Black Gulch Creek. The City shall seek the cooperation of Stanislaus County, Caltrans, Army Corps of Engineers, and local irrigation districts in developing this solution. The preferred solution consists of a positive flow system to the San Joaquin River designed to accommodate a minimum of 100-year storm, if feasible.
- IV.C.2. Where practical and economical, the City shall upgrade existing drainage facilities as necessary to correct localized flooding problems.
- IV.C.3. The City shall expand and develop storm drainage facilities to accommodate the needs of existing and planned development.
- IV.C.4. The City shall form storm drainage districts as needed to ensure that needed storm drainage facilities are properly constructed, operated, and maintained.
- IV.C.5. The City shall, through a combination of drainage improvement fees and other funding mechanisms, ensure that new development pays its share of the costs of drainage system improvements.
- IV.C.6. Future drainage system discharges shall comply with applicable state and federal pollutant discharge requirements.

## **3. Impacts**

The drainage area located on the west side of Patterson from the existing city limits to the Delta-Mendota Canal will experience the greatest impact. There are approximately 1,000 acres of even terrain at a one percent slope. This drainage area is also impacted by runoff from Salado Creek, Black Gulch Creek, and

Del Puerto Creek water sheds. Figure V-3 indicates the watershed areas of these three creeks. The water sheds are much larger than the drainage area, comprising many thousands of acres of steep mountainous terrain. The remaining areas between the existing easterly Patterson city limits and Planning Area limits will have less impact on the master trunk storm drain system.

At buildout of the *General Plan*, stormwater runoff will increase by 650 cfs from urban development covering previous areas such as dirt or fields with impervious surfaces such as roofs and pavement. The most substantial increases in runoff will occur in the drainage area west of the current city limits to the Delta-Mendota Canal, as discussed in the previous section. This area is currently predominantly agricultural and is designated for urban development under the *General Plan*.

The *Storm Drainage Master Plan* addresses the impacts of development under the *General Plan* on drainage. The *Storm Drainage Master Plan* recommends a combination of open channels and underground pipes.

Figure V-4 is a schematic drawing of the *Storm Drainage Master Plan*. To address flooding related to Salado Creek, a detention pond is proposed to be built upstream, south of the Delta-Mendota Canal, to prevent having the peak runoff coincide with that of Black Gulch Creek. The Salado Creek channel is proposed to be 7 feet in depth, 10 feet in width at the bottom, and 2 to 1 slope on the banks.

To address flooding related to Black Gulch Creek, a 96-inch pipe is proposed, beginning at the intersection of Sperry Avenue and the California Aqueduct. It will run along Rogers Road northward to the north boundary of the Planning Area and will turn eastward and continue with an open channel along the Planning Area boundary. The channel will start with 5 feet in depth with 10 feet in width at the bottom, and will increase to 5.5 feet in depth before merging with Salado Creek.

As proposed, the Black Gulch Creek channel and Salado Creek channel will merge to a single channel with 8 feet in depth and 10 feet in width at the bottom. This channel will continue to the Patterson Water District Main Canal. At that point, two 120-inch pipes will be constructed along the existing Salado Creek alignment to Highway 33 and the Southern Pacific Railroad. After crossing the railroad, the pipes will connect with an open channel along a 150-foot wide "greenbelt" to the San Joaquin River. This channel will begin with 10 feet in depth, 18 feet in width at the bottom and will increase to 9 feet in depth, 20 feet in width at the bottom, and 2 to 1 slope on the banks. With the 150-foot wide right-of-way acquired, some form of linear park can be developed.

Three other main trunk lines are proposed to be connected to the system described above. One 66-inch pipe will begin at Sperry and Ward Avenues and run northward to Salado Creek. One 96-inch pipe will begin at Sperry Avenue and Highway 33 and run along Highway 33 northwesterly to Salado Creek. One open channel with 4 feet in depth, 6 feet in width at the bottom, and 2 to 1 slope on the banks, will run east of Sycamore Avenue between Las Palmas Avenue and the main greenbelt channel.

All the proposed open channels will have a low flow concrete V-ditch at the channel bottom. The channel depths described are the minimums required for hydraulic capacity. Additional depth may be needed when other facilities cross the channels. This will be determined during the final design for construction.

In summary, the *Storm Drainage Master Plan* will consist of a total of 22,190 feet of new underground pipes, 30,850 feet of new open channels and 13,000 feet of improvements of existing creek channel.



A preliminary estimate of probable capital costs to implement the *Storm Drainage Master Plan* is between \$19.3 million and \$21.3 million. The City will provide for adequate financing for all necessary drainage system improvements that can reasonably assumed through a combination of sources and techniques.

The *General Plan Policy Document* provides for the expansion, development, and financing of new storm drainage facilities. The impact of the *General Plan* on drainage in Patterson would, therefore, be less-than-significant.

#### **4. Mitigation Measures**

No mitigation measures are necessary other than adoption and implementation of the *Storm Drainage Master Plan* and associated funding mechanisms.

### **E. POLICE**

The Patterson Police Department is located at 433 West Las Palmas Avenue. As of Spring 1991, the Police Department employed 17 sworn officers. This works out to a ratio of approximately 1.9 sworn officers per 1,000 population.

For Priority 1 calls, which constitute major crimes or incidents in progress, the Police Department has a typical response time of less than three minutes.

#### **1. Implications of the General Plan Land Use Diagram**

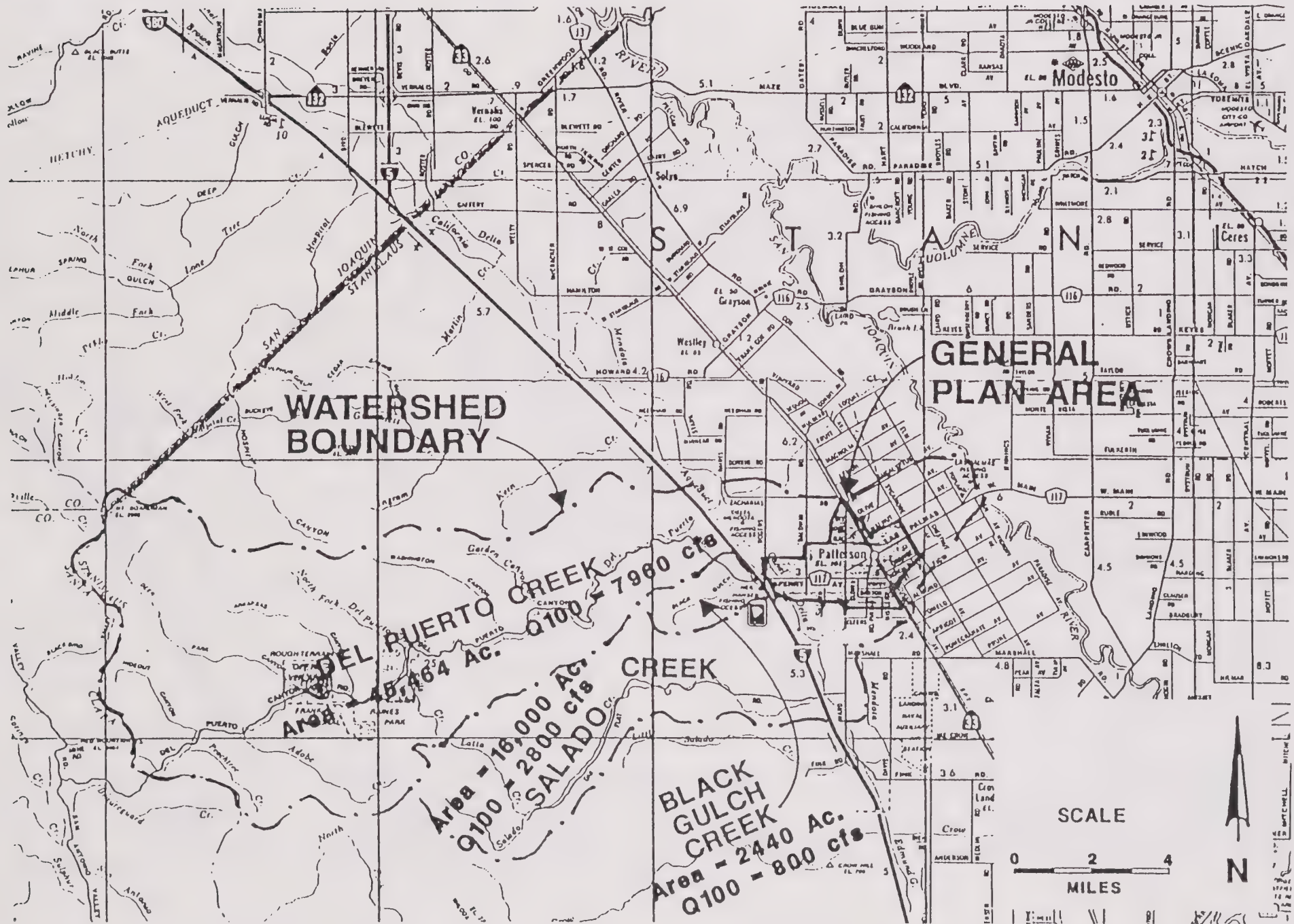
As the city grows, increased population and new commercial and industrial development will increase the need for police service. Police service requirements are also influenced by the demand for traffic control and traffic accident services. The higher the traffic volumes, the greater the need for traffic control services. Response times could increase if staffing does not keep pace with the increased demand for police service.

To estimate future staffing needs, a ratio between 1.5 to 2.0 sworn officers per 1,000 population was assumed. While Patterson currently has a ratio of 1.9 officers per 1,000 population, as cities grow larger, the ratio often falls as the department is able to achieve economies of scale. The actual number required will depend on the types of land uses, overall crime rates, and response times demanded by the City. At full buildout population of 30,798, the Patterson Police Department would require between 46 and 62 total sworn officers, or an increase of 29 to 45 additional officers, plus support personnel and equipment. Within the time frame of the *General Plan*, at the population target of 21,000, the Police Department would require 32 to 42 total sworn officers, or 15 to 25 additional officers.

#### **2. General Plan Policy Response**

The *General Plan Policy Document* contains the following policies to assure that adequate levels of police service and facilities are maintained:

FIGURE V-3  
WATERSHED IMPACT MAP







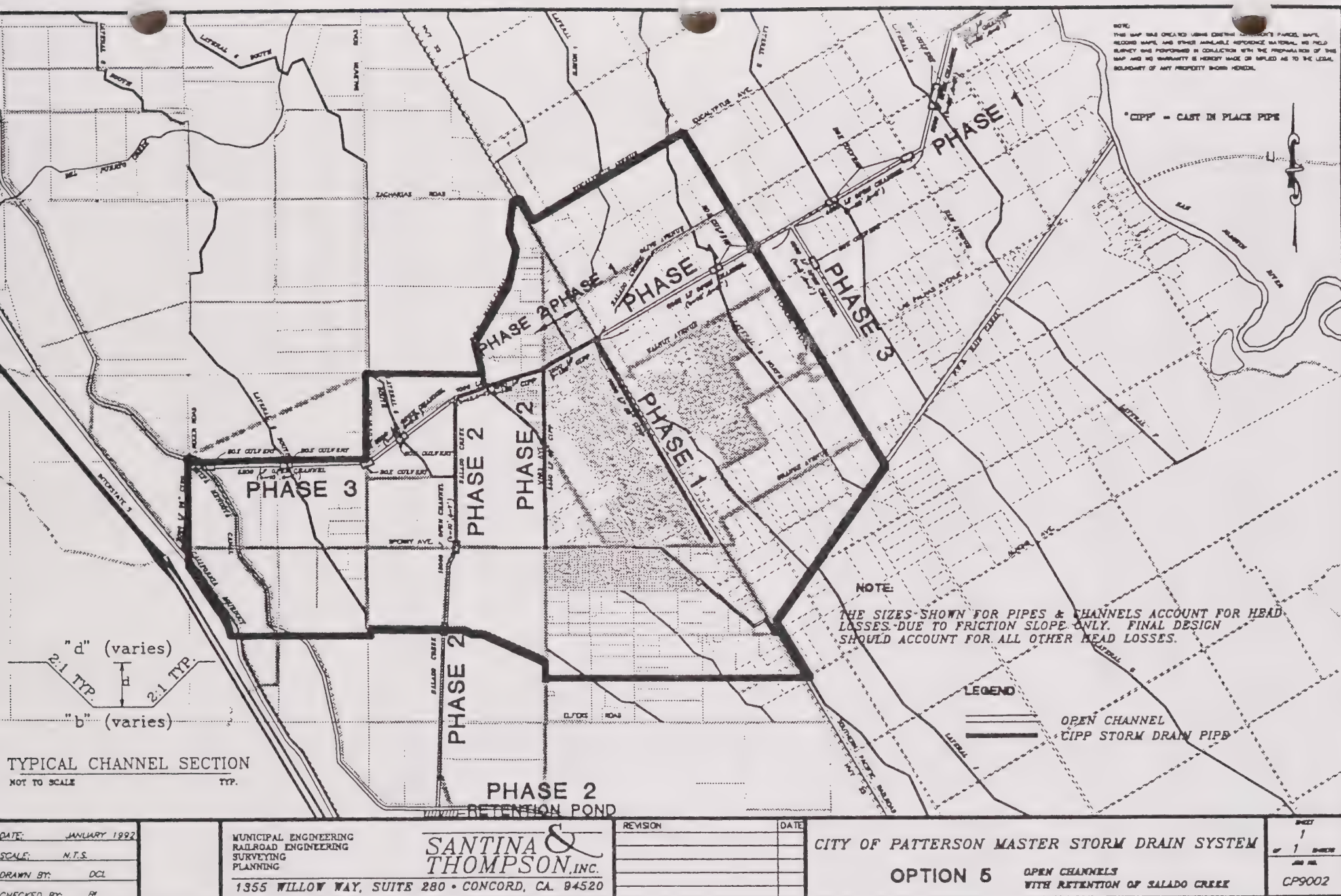


FIGURE V-4

STORM DRAINAGE MASTER PLAN



- IV.E.1. The City shall, through adequate staffing and patrol arrangements, endeavor to maintain the minimum feasible response times for police calls. The goal for average response time for Priority 1 (emergency) calls shall be three minutes.
- IV.E.2. The Police Department shall continually monitor response times and report annually on the results of the monitoring.
- I.F.3. The City shall pursue the development of a public safety facility, including a fire station and police station.

### **3. Impacts**

Within the time frame of the *General Plan*, the Patterson Police Department would require between 32 and 42 sworn officers, or 15 to 25 additional officers, plus additional support personnel and equipment. Expansion of the Police Department facilities would also be required. At full buildout, 46 to 62 total sworn officers, or 29 to 45 additional officers, would be required.

The *General Plan Policy Document* contains policies aimed at reducing demand for police services and endorses minimum response times with staffing to ensure these goals. It also proposes development of a new public safety facility to house the police department. Therefore, the impact of the *General Plan* on police service is deemed to be less-than-significant.

### **4. Mitigation Measures**

None required.

## **F. FIRE**

Fire protection is provided by the Patterson Fire Department. The Patterson Fire Department is a volunteer fire department which shares a full-time fire chief with the West Stanislaus Fire District (WSFD), which provides fire protection to the unincorporated area surrounding Patterson.

In 1990, the Patterson Fire Department was staffed by 40 volunteers who, along with 85 other volunteers, served the WSFD.

The Fire Department is located at 433 West Las Palmas Avenue. Patterson maintains an Insurance Services Office (ISO) rating of 6 on a scale of 1 to 10, 1 being best. Response times within the city are typically about three to six minutes.

### **1. Implications of the General Plan Land Use Diagram**

Fire service is similar to police service in terms of need to maintain a 24-hour response capability and the need to minimize response times to calls. The City currently is adequately served through a fully volunteer fire force. There are no clear population thresholds to indicate at what level paid personnel will be required. Rather, the need for paid fire personnel will be dependent on the levels of service maintained by the Patterson Fire Department as the city grows.



According to the Patterson Fire Chief, a ratio of 1.00 to 1.25 sworn full-time firefighters per 1,000 population is an appropriate standard. Using this standard, 30 to 39 full-time firefighters would be required at buildout, 21 to 26 within the time frame of the *General Plan*. Additional non-sworn personnel and fire safety inspectors will also be required.

It is unlikely that Patterson will rely on a fully paid or fully volunteer fire force over the next 20 years, but more likely a combination of volunteers and paid firefighters.

In addition, to provide adequate response time and facility space, at least one additional fire station will be required.

## **2. General Plan Policy Response**

The *General Plan* contains the following policies to address the implications of development on fire service:

- IV.F.1. The City shall endeavor to achieve and maintain an overall fire insurance (ISO) rating of 5 or better. The goal for average response time for Priority 1 (emergency) calls shall be five minutes for 95 percent of the calls.
- IV.F.2. Fire stations shall be strategically located to ensure optimal response time. The existence of physical barriers such as railroad tracks shall be an important siting consideration.
- IV.F.3. The City shall consider requiring installation of built-in fire suppression equipment in all new development.
- I.F.3. The City shall pursue the development of a public safety facility, including a fire station and police station.

## **3. Impacts**

Increased population and new commercial and industrial development under the *General Plan* will increase the need for fire service, including one or more additional fire stations, and most likely the need for some full-time paid personnel. The *General Plan Policy Document* includes policies to maintain specified levels of fire service. The City has an adopted facilities impact fee assessed on new development to pay for a variety of facilities, include fire. The *General Plan* provides for annual review and revisions of impact fees. The fire service-related implications of the *General Plan*, therefore, are deemed to be less-than-significant.

## **4. Mitigation Measures**

None required.

## G. SCHOOLS

The Patterson Unified School District (PUSD) provides public education services to Patterson. In the 1990-91 school year, used as the baseline for purposes of the *General Plan*, the District operated one elementary school serving grades K-3, one elementary school serving grades 4-6, one junior high school (grades 7-8), and one high school (grades 9-12). Schools are discussed in Chapter VI of the *General Plan Background Report*.

### 1. Implications of the General Plan Land Use Diagram

The implications of the *General Plan Land Use Diagram* on schools were assessed by analyzing new student generation at buildout of the *General Plan* added to 1990-91 enrollment. The number of new schools required was estimated based on remaining school capacity in 1990 and assumed typical capacity levels for new schools. In the 1990-91 school year, all schools in the Patterson were close to or were exceeding their capacities. The District has been studying the possibility of instituting year-round education on a multiple track system to maximize use of space. Under multiple track year-round education, schools can accommodate about 25 percent more students on an annual basis.

There is one parochial school in Patterson which serves grades K-6, with an enrollment of 85 in 1990. For purposes of analysis, it is assumed that enrollment in private schools will remain basically constant.

The number of additional students generated under buildout of the *General Plan* was calculated using student yield factors from the PUSD's *Demographic/Facility Study*, published in August 1990. The report lists yield factors for each grade.

Table V-4 gives the yield factors for each grade and the number of students generated for each grade at buildout of the *Land Use Diagram*.

**TABLE V-4**  
**ADDITIONAL PUSD STUDENT ENROLLMENT BY GRADE LEVEL**  
**Full Buildout and 2011**

Grade Level	Student Yield Factor <sup>1</sup>	Full Buildout		2011	
		New Dwelling Units <sup>2</sup>	Student Population	New Dwelling Units <sup>3</sup>	Student Population
K	.069	7,789	537	4,539	313
1	.101	7,789	787	4,539	458
2	.101	7,789	787	4,539	458
3	.065	7,789	506	4,539	295
4	.056	7,789	436	4,539	254
5	.054	7,789	421	4,539	245
6	.065	7,789	506	4,539	295
K-6	.511	7,789	3,980	4,539	2,319
7	.054	7,789	421	4,539	245
8	.037	7,789	288	4,539	168
7-8	.091	7,789	709	4,539	413
9	.049	7,789	382	4,539	222
10	.050	7,789	389	4,539	227
11	.032	7,789	249	4,539	145
12	.015	7,789	117	4,539	68
9-12	.146	7,789	1,137	4,539	662
<b>Total</b>	<b>.748</b>	<b>7,789</b>	<b>5,826</b>	<b>4,539</b>	<b>3,395</b>

<sup>1</sup>From Patterson Unified School District *Demographic/Facility Study*, August 1990

<sup>2</sup>From Table II-1

<sup>3</sup>Assumed number of additional dwelling units to accommodate a total of 21,000 population in 2011

According to Table V-4, buildout of the *General Plan* would generate an additional 5,826 students in the Patterson Unified School District, 3,395 students within the time frame of the *General Plan*. Of these, at full buildout, 3,980 would be in grades K-6, 709 in 7-8, and 1,137 in 9-12. In 2011, 2,319 would be in grades K-6, 413 in 7-8, and 662 in 9-12.

This analysis assesses the impact of buildout of the *General Plan* for elementary, junior high school, and high schools. The analysis discusses the impacts if schools will house their current grade levels (K-6 elementary; 7-8 junior high school; 9-12 high school). The results may differ slightly if grade levels are shifted (e.g., K-5 elementary; 6-8 middle school or 7-9 junior high; 10-12 high school).



This analysis does not reflect current facility planning by the Patterson Unified School District. New schools will be developed by the District based on the rate of new student growth in specific areas, available sites, closure of existing schools, and District policy. This analysis is intended to provide a general assessment of the number of new students the District might expect at buildout of the *General Plan* and in 2011, and the implications of this student population on schools in Patterson.

### Elementary Schools

At buildout of the *General Plan*, 3,980 K-6 students would be generated. Assuming 600 to 700 students per elementary school, buildout would require six new elementary schools. Within the 2011 time frame of the *General Plan*, three to four new elementary schools would be required. Elementary school sites are assumed to be approximately 10 acres each. Possible locations for elementary schools are shown in Figure V-5. These are not specific proposals for the locations of future elementary schools, but simply possible school locations used for illustrative purposes only. The specific locations of future schools will depend on the location of new development and policies and siting decisions of the Patterson Unified School District.

### Junior High School

Based on discussions with the District Superintendent, the PUSD intends to expand the existing Patterson High School site to the junior high school site, and construct an entirely new junior high school to serve existing and new junior high school students. The *Land Use Diagram* shows a potential new 20-acre junior high school site as shown in Figure V-5. At buildout, with existing junior high school enrollment of 484, the junior high school would accommodate a total of 1,193 students; a total of 897 by 2011.

### High School

It is assumed that all new high school students would be accommodated through expansion of the high school site. At buildout of the *General Plan*, with the existing enrollment of 662 students, at buildout the high school site would accommodate a total of 1,799 students; 1,324 by 2011.

## 2. General Plan Policy Response

The *General Plan* includes the following policies to assist the Patterson Unified School District in providing for new schools and educational services required by development under the *General Plan*:

- IV.G.1. The City shall assist the Patterson Unified School District and others in locating and reserving appropriate sites for new schools.
- IV.G.2. Standards established by the Patterson Unified School District shall be considered in determining the number and location of new school sites. These standards are based on the assumed average number of students per household for each grade level (which varies for different types of housing) and the average size of an elementary school, junior high school, or high school.

- IV.G.3. New elementary schools should, to the extent practicable, be located on collector streets within residential areas. Elementary schools should be sited to avoid barriers such as railroad tracks and arterial streets that would separate them from the surrounding residential areas.
- IV.G.4. The City shall work cooperatively with the Patterson Unified School District in monitoring housing, population, and school enrollment trends to plan for future school facility needs.
- IV.G.5. The City shall support enactment of state legislation to finance the construction of new schools.
- IV.G.6. The City shall approve only those development proposals that have recognized and mitigated their full impact on school facilities, as determined by the City Council. The City shall work with the Patterson Unified School District to identify, establish, and implement additional measures that may be necessary to adequately finance school facilities in the city.
- IV.G.7. The City shall require, to the extent possible, that new school facilities are constructed concurrently with new residential development.

### **3. Impacts**

Full buildout of the *General Plan* would generate a total of 5,826 new students: 3,980 in grades K-6, 709 in grades 7-8, and 1,137 in grades 9-12. This would require the development of six new K-6 elementary schools, a new junior high school, and expansion of the high school.

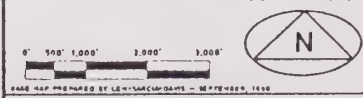
Within the time frame of the *General Plan*, it is assumed that development under the *General Plan* would generate a total of 3,295 new students: 2,319 in grades K-6, 413 in grades 7-8, and 662 in grades 9-12. This would require the development of three new K-6 elementary schools, one new junior high school, and expansion of the high school.

Since the passage of Proposition 13, school districts have relied on state funding for the construction of new school facilities. Additionally, under state law, school districts in California are permitted to levy impact fees on new development to fund new school facilities. As of June 1990, PUSD levied \$1.28 per square foot on new residential development and \$.26 per square foot on commercial and industrial development. Fees are adjusted annually, as determined by the State, to reflect cost of living increases. Impact fees are generally considered insufficient to cover the costs for new school facilities associated with new development.

The availability of State financing for new school facilities is uncertain, given the limited state funds and the competition among school districts. To the extent that impact fees are inadequate to finance new school facilities and state funding is uncertain, adequate school financing is not guaranteed. Therefore, reliance on these options could conceivably result in serious overcrowding and deterioration in the quality of schools.

Alternative sources of funding include Mello-Roos financing districts (a form of special assessment district), general obligation bonds, developer agreements, and sale and/or trade of surplus school property. Other measures, such as instituting year-round schools and addition of portable classrooms at existing

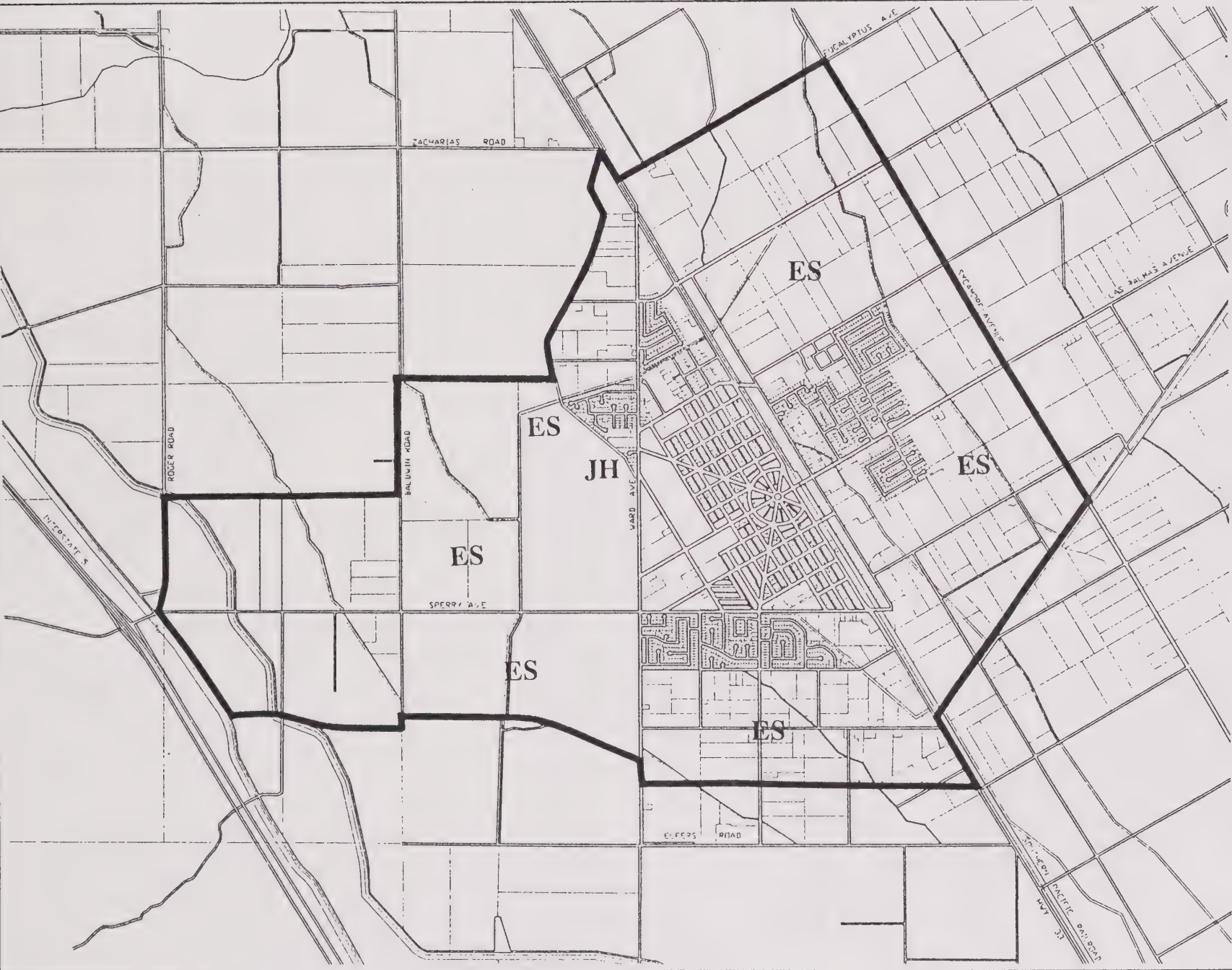




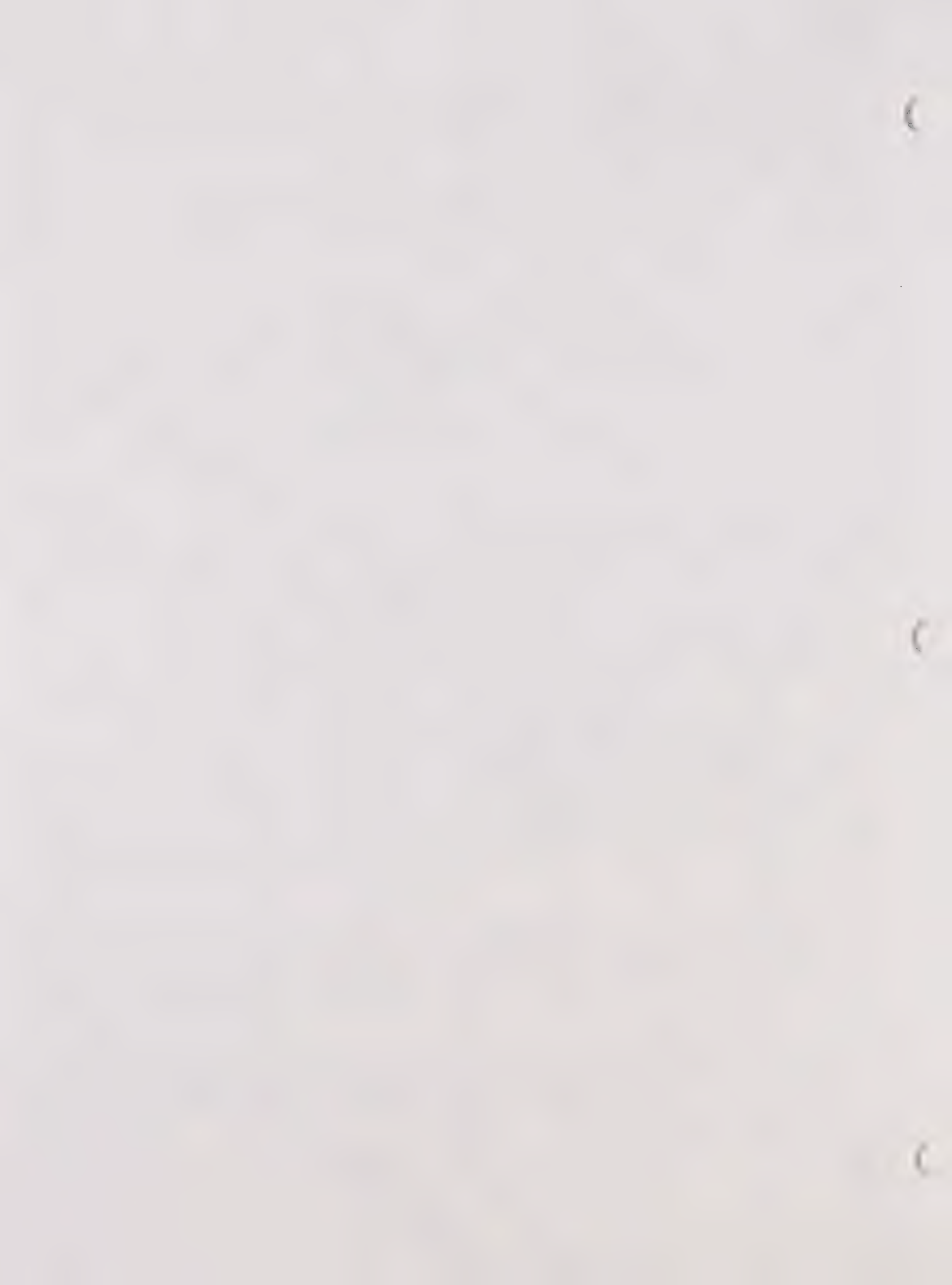
# City of Patterson

FIGURE V-5  
APPROXIMATE  
LOCATIONS  
OF FUTURE SCHOOLS

ES = Elementary  
JH = Junior High







school sites, could also be implemented at the discretion of the Patterson Unified School District to address additional school impacts.

The *General Plan Policy Document* includes several policies concerning the City's cooperation with the school district in ensuring that new development addresses school impacts and in assisting with obtaining funding mechanisms. Therefore, the impacts of new development under the *General Plan* would have a less-than-significant impact on school facilities in Patterson.

#### 4. Mitigation Measures

None required.

### H. MEDICAL SERVICES

Del Puerto Hospital provides acute and emergency medical services to Patterson residents. Del Puerto Hospital is operated by the Del Puerto Hospital District, which includes all of western Stanislaus County north of Crows Landing, including the communities of Crows Landing, Westley, Vernalis, and Grayson in addition to Patterson.

Del Puerto Hospital is an acute care facility which began operations in 1950. Its facilities include medical and surgical care and perinatal care. In April 1991, the Hospital plans to begin operating a skilled nursing facility. The Hospital is licensed for 39 beds; the skilled nursing facility is planned 18 beds. In addition, there are 6 perinatal and 19 medical/surgical beds. The hospital is discussed in Chapter VI of the *General Plan Background Report*.

#### 1. Implications of the General Plan Land Use Diagram

The implications of the *General Plan Land Use Diagram* on hospital services was assessed by analyzing the need for additional beds and equipment based on development under the *Land Use Diagram*.

In 1985, the hospital adopted a *20-Year Development Plan for Del Puerto Hospital* to plan for the hospital's growth and expansion from 1985 to 2005. The *Master Plan*'s estimated number of beds based on estimates of the Hospital's market area population is shown in Table V-5.

TABLE V-5

**DEL PUERTO HOSPITAL  
ESTIMATED NUMBER OF BEDS AND SQUARE FOOTAGE NEEDED  
1985 - 2005**

	1985	1990	1995	2000	2005
Hospital Market Area Population <sup>1</sup>	11,646	17,524	22,526	29,740	40,226
<b>Bed Need</b>					
Medical/Surgical/Pediatric	19	16	21	27	37
Chemical Dependency	7	11	14	18	25
Perinatal	2	3	4	5	7
Intensive Care	N/A	3	4	5	6
Skilled Nursing	N/A	36	46	61	83
<b>Total Bed Need</b>	<b>28</b>	<b>69</b>	<b>89</b>	<b>116</b>	<b>158</b>

<sup>1</sup> Total market area includes Patterson, Crows Landing, Vernalis, Westley, Grayson, and Other. Population projections for Patterson area: 1985 - 5,020; 1990 - 8,138; 1995 - 12,907; 2000 - 20,021; 2005 - 24,871.

Source: *Twenty-Year Development Plan for Del Puerto Hospital: 1985-2005*, Prepared by Cattaneo & Stroud, Inc., Burlingame, CA, 1986.

As Table V-5 indicates, the *Master Plan* indicated that 158 beds would be required in 2005, based on market area population of 40,000, of which Patterson comprised almost 25,000, or 60 percent. While the *General Plan* sets out lower population targets, proposed developments elsewhere in the district, including Grayson and the proposed Lakeborough new town, could more than account for the higher population assumed for Patterson.

For purposes of analysis, the following multipliers were used to estimate the number of beds required in 2011 and at full buildout of the *Land Use Diagram* from development in Patterson alone:

- 1.21 medical/surgical beds per 1,000 population
- 2.05 skilled nursing beds per 1,000 population

Table V-6 shows the number of new medical/surgical and skilled nursing beds that would be required in 2011 and at full buildout of the *Land Use Diagram* at Del Puerto Hospital as a result of development in Patterson.



TABLE V-5

**MEDICAL/SURGICAL BEDS AND SKILLED NURSING BEDS  
2011 and Full Buildout**

Additional Population	11,800	21,623
Medical/Surgical Beds	14	26
Skilled Nursing Beds	24	44

Source: Del Puerto Hospital, 1991

As growth continues and demand for hospital services in the Patterson area and throughout the Patterson Hospital District increases, there will be a need for hospital expansion and possible relocation.

The Patterson Ambulance Company operates two ambulances out of Del Puerto Hospital. Five full-time paramedics and a number of volunteer ambulance workers provide service to the entire Planning Area and beyond. Based on a ratio of 0.0553 staffed vehicles per 1,000 population, growth under the *Land Use Diagram* will require an additional ambulance vehicle.

## 2. General Plan Policy Response

The *General Plan* includes the following policies to promote the expansion of medical and hospital facilities as required by development under the *General Plan*:

- I.D.1. The City shall encourage the maintenance and expansion of hospital and medical facilities to meet the needs of Patterson residents, employees, and visitors.
- I.D.2. The City shall promote the establishment, maintenance, and expansion of businesses in Patterson that support the hospital.
- I.D.3. The City shall encourage efforts to attract medical industry and health professionals to Patterson.
- I.D.4. The City shall support the Patterson Hospital District in the rehabilitation and expansion of Del Puerto Hospital, promotion of the hospital, efforts to attract support medical facilities, and solutions to problems with the hospital, as such support is consistent with other City goals and policies.
- IV.H.1 The City shall support the development and maintenance of adequate hospital and acute health care facilities in Patterson.
- IV.H.2. The City shall encourage the development of convalescent facilities in the city.
- IV.H.3. The City shall cooperate with the Patterson Hospital District in identifying and evaluating the impacts of demographic changes which may affect the need for new medical facilities.

IV.H.4. The City shall assist and cooperate with the Patterson Hospital District in levying and collecting fees to aid in the financing of necessary capital improvements to the health care facilities of the district.

### 3. Impacts

As growth continues and demand for hospital services in the Patterson area and throughout the Patterson Hospital District increases, there will be a need for hospital expansion and possible relocation. The *Land Use Diagram* designates a site at the northwest intersection of Sperry Avenue and Baldwin Road as a site for a new hospital and associated medical/ professional offices. While this site is larger than would be required merely for hospital facilities and medical offices to serve demand within the Patterson Planning Area, the *General Plan* sets forth a goal "to designate adequate land and provide support for the development of hospital and medical offices to serve Patterson residents and to become the medical service hub for western Stanislaus County" (Goal I.D). It is therefore assumed that medical development in Patterson will serve a larger market area.

Development under the *General Plan* will create a need for 14 additional medical/surgical beds and 24 additional skilled nursing beds by 2011 and 21 additional medical/surgical beds and 36 new skilled nursing beds at full buildout of the *General Plan*.

The *General Plan Policy Document* includes several policies concerning the City's support of the expansion of medical facilities and in assisting the hospital district with obtaining funding mechanisms. Therefore, the impacts of new development under the *General Plan* would have a less-than-significant impact on medical facilities in Patterson.

### 4. Mitigation Measures

None required.

## I. SOLID WASTE

The City of Patterson provides mandatory garbage collection throughout the city. In 1990, the City collected approximately 5,625 tons. This works out to approximately 3.5 pounds per day per capita, with commercial and industrial uses included in the per capita figures. Patterson's garbage is disposed of at the Fink Road waste-to-energy plant and landfill, just west of Crows Landing.

### 1. Implications of the General Plan Land Use Diagram

To calculate future solid waste generation, typical waste generation factors were applied to total population and number of employees in Patterson at buildout of the *General Plan* and in 2011. These calculations correspond to Patterson's current waste generation rates, but break out employment separately since the ratio of employees to residents will increase at buildout of the *General Plan*. These calculations are shown in Table V-7.

TABLE V-7

**TOTAL SOLID WASTE GENERATION  
2011 and Full Buildout**

Land use	Measuring Unit		Multiplier	Solid Waste Generation (lbs/day)	(tons/yr)
<u>2011</u>					
Residential	21,000	persons	3.3 lbs per capita	69,300	12,647
Employment*	15,000	employees	2.4 lbs/employee	36,000	6,570
<b>Total</b>				<b>105,300</b>	<b>19,217</b>
<u>Buildout of the General Plan</u>					
Residential	30,798	persons	3.3 lbs per capita	101,633	18,548
Employment*	15,000	employees	2.4 lbs/employee	36,000	6,570
<b>Total</b>				<b>137,633</b>	<b>25,118</b>

\*Total employees at buildout

Source: J. Laurence Mintier & Associates

As shown in Table V-7, at current disposal rates, development within the time frame of the *General Plan* will generate a total of approximately 19,217 tons of solid waste per year, or an increase of 70 percent.

Stanislaus County estimates that the Fink Road landfill facility has the capacity for 15 years and is contemplating expansion at the site. While the population and employment projections for Patterson assumed by Stanislaus County are lower than those permitted under the *General Plan*, these would be offset if the City is able to reduce its waste according to the policies set forth in the *General Plan*.

## 2. General Plan Policy Response

The *General Plan* includes the following policies to address the implications of increased solid waste generation from development:

IV.D.1. The City shall study and actively pursue methods of solid waste recycling and reuse, including source separation, with the goal of reducing its solid waste generation by 25 percent by 1995 and 50 percent by the year 2000.

IV.D.2. The City shall continue to require mandatory garbage collection throughout the city.



IV.D.3. The City shall maintain close contact with the Stanislaus County Public Works Department concerning the City's continuing use of the Fink Road Waste-to-Energy Plant and its capacity projections.

### 3. Impacts

At current generation rates, buildout of the *General Plan* would require the disposal of a total of 25,118 tons of solid waste per year from Patterson at the Fink Road Waste-to-Energy Plant and Landfill; 19,217 tons by 2011. If the City achieves its goal of 50 percent reduction through recycling and waste diversion practices by 2005, however, annual disposal would be reduced to 9,600 tons per year in 2011 and 12,600 tons at full buildout.

The Fink Road Landfill has adequate capacity for Patterson's projected quantity of waste, even without a successful waste reduction program. Growth in Patterson would, however, hasten the time at which its capacity was exhausted. While the population and employment projections for Patterson assumed by Stanislaus County are lower than those permitted under the *General Plan*, these would be offset if the City is able to reduce its waste according to the policies set forth in the *General Plan*.

Given the capacity of the landfill and considering that Patterson's waste is currently only a fraction of the total waste disposed of at the landfill, the solid waste impacts of the *General Plan* are considered to be less-than-significant.

### 4. Mitigation Measures

None required.

## J. LIBRARY

The Patterson branch of the Stanislaus County library system is located at 46 North Salado Avenue. The library has a total of 23,000 volumes. The library facility occupies 5,800 square feet.

### 1. Implications of the General Plan Land Use Diagram

The Patterson library currently maintains a ratio of 2.6 volumes per capita. Applying this figure to the buildout population of the *General Plan* would mean the library would need a total of 69,430 volumes, or an increase of 46,400 volumes. Within the time frame of the *General Plan*, the library would need a total of 54,600 volumes, or an additional 31,600.

The library currently maintains a 0.66 square feet of library space per capita. 0.5 square feet per capita is commonly used in library planning.

At Patterson's buildout population of 30,798, the city would require 15,400 square feet, or an increase of 9,600. Within the time frame of the *General Plan*, the library would require a total of 10,500 square feet, or an increase of 4,700 square feet.

Additional staffing and equipment would also be required.

## 2. General Plan Policy Response

The *General Plan Policy Document* contains the following policies concerning the development of library facilities:

IV.G.8. The City shall support the efforts of the Stanislaus County Public Library in providing services to the citizens of Patterson.

Stanislaus County libraries are not under City jurisdiction. The system is funded through a variety of sources, including property tax revenues, motor vehicle in-lieu fees, special district fees, facility fees, and other mechanisms.

## 3. Impacts

Development under the *General Plan* will increase the demand for library services in Patterson. Increased revenues associated with new development and growth under the *General Plan* should provide funding for additional volumes, staffing, and library space expansion. Expansion and provision of library services is subject to the discretion of Stanislaus County. The *General Plan* does, however, include policies to encourage the efficient development of library services.

The impact of the *General Plan* on library services is considered less-than-significant.

## 4. Mitigation Measures

None required.

## K. UTILITIES

Gas and electricity service is provided to Patterson by Pacific Gas & Electric Company. Existing electrical transmission lines consist of 115 kilovolt source lines.

Telephone service is provided by Evans Telephone Company.

### 1. Implications of the General Plan Land Use Diagram

Buildout under the *General Plan* could require extension of gas and electrical lines, and expansion of existing substations. Additional telephone lines would also be required.

## 2. General Plan Policy Response

The *General Plan* includes the following policies to provide for the development and proper siting of utility facilities:

IV.I.1. Public facilities, such as utility substations, water storage or treatment plants, pumping stations, and sewer treatment plants, shall be located, designed, and maintained so that noise, light, glare, or odors associated with these facilities will not adversely affect nearby land uses. Building and

landscaping materials that make these facilities compatible with neighboring properties shall be used.

IV.I.2. Utility company rights-of-way shall be considered for use as public or private open space, trails, parkland, or other compatible recreational uses.

IV.I.3. The City shall require all new electrical and communication facilities to be installed underground or, in the case of transformers, pad-mounted. The City shall actively promote the undergrounding of existing overhead facilities.

### **3. Impacts**

Development under the *General Plan* would require extensions and improvements to electric, gas, and telephone lines. Expansion of existing substations would be required at buildout of the *General Plan*. Extensions and improvements to electrical, gas, and telephone lines would be funded by new development as it occurs. The costs for expansion of capital facilities are spread over the entire service area, as regulated by the California Public Utilities Commission.

The increased demand on gas, electricity, and telephone service is deemed to be a less-than-significant impact.

### **4. Mitigation Measures**

None required.



## CHAPTER VI

### RECREATIONAL AND CULTURAL RESOURCES

#### A. INTRODUCTION

This section analyzes the impacts of the *General Plan* on recreational and cultural resources in Patterson, including park facilities, recreation programs, historical buildings and places, and locations with archeological significance. Existing recreational and cultural resources are discussed in Chapter VII of the *General Plan Background Report*.

#### B. PARKS AND RECREATION

The City of Patterson maintains and operates park facilities and recreation programs for the benefit of its residents. As of 1990, the City had two public parks with a total of eight acres. Given the City's 1990 incorporated population of 8,869, this provides approximately 0.9 acres of parkland per 1,000 residents. In addition, the City sponsors numerous recreation programs, including basketball, softball, and volleyball leagues, aquatic activities, senior programs, enrichment classes, and youth activities.

##### 1. Implications of the General Plan Land Use Diagram

Development in accordance with the *General Plan*, while providing opportunities for parkland acquisition and development, will place demands on existing facilities and programs and create additional demands for new facilities and programs.

The *General Plan* contains a park standard of five acres of parkland (combined neighborhood and community) per 1,000 residents. As of 1990, Patterson had about eight acres of parkland. Based on the *General Plan* standard, this represented a deficit of developed parkland of approximately 36 acres.

At buildout of the *General Plan*, an additional 21,623 residents would be added to incorporated Patterson, creating a need for 107 new acres of parkland. Within the time frame of the *General Plan*, the additional 12,131 residents would require approximately 61 additional acres of parkland.

The *General Plan Land Use Diagram* proposes no specific sites for future parks, with the exception of the public plaza/senior center/community center site. Figure VI-1 shows generalized areas for potential park sites. These potential sites are intended for illustrative purposes only; more precise locations for parks will be identified as development in currently-undeveloped areas of the city takes place.

This discussion does not address regional parks, as the *General Plan* proposes no population standards for regional parks.

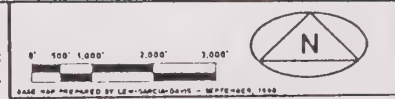
##### 2. General Plan Policy Response

The *General Plan* contains the following policies which address the implications of increased population and new development on park and recreation facilities and programs:

- V.A.1. The City shall prepare and adopt a *Parks Master Plan* which includes the following components:

- Locational standards
- Preferred sites
- Improvement and equipment standards
- Development priorities
- Financing mechanisms
- Development of community activity centers

- V.A.2. The City shall establish a standard of five acres of developed parkland (combined neighborhood and community) per 1,000 residents.
- V.A.3. New development shall be required to assist in meeting the City's standard of five acres per 1,000 residents. To this end, the City shall require all new development to dedicate land, dedicate improvements, pay in-lieu fees, or a combination of these determined acceptable by the City, to the maximum extent authorized by law.
- V.A.4. The City shall pursue all available and appropriate county, state, and federal funding for the acquisition of parkland and the development of park facilities.
- V.A.5. Neighborhood parks shall be integrated into, and become focal points of, new residential neighborhoods. Pedestrian accessibility shall be emphasized.
- V.A.6. The City shall promote the development of one or more large-scale park complexes in Patterson.
- V.A.7. The City shall pursue joint-use of school facilities as a high priority for the development of new park and recreational facilities, especially for after-school activities.
- V.A.8. Parks shall be located, oriented, and designed in such a way as to facilitate security, policing, and maintenance.
- V.A.9. New high-activity-level parks and parks intended for night use shall be designed to buffer existing and planned surrounding residential uses from excessive noise, light, and other potential nuisances.
- V.A.10. The City shall identify appropriate open spaces, including areas within the downtown and its western extension and along Salado Creek, for development of safe community activity areas.
- V.A.11. The City shall emphasize the use of drought-tolerant and drought-resistant landscaping in the development of City parks.
- V.A.12. The City shall assign high priority to the improvement and rehabilitation of parks in existing neighborhoods.
- V.A.13. The City shall encourage the use of open space and recreational uses as buffers between incompatible land uses.



# City of Patterson

FIGURE VI-1  
APPROXIMATE  
LOCATIONS  
OF FUTURE PARKS

- N = Neighborhood Park  
C = Community Park  
P = Plaza





- V.A.14. The City shall pursue the development of a citywide network of pedestrian and bicycle pathways.

### 3. Impacts

At buildout of the *General Plan*, an additional 107 acres of neighborhood and community parkland will be required; 61 acres by 2011. This does not include addressing any existing park deficit.

The *General Plan* encourages and provides for the development of parks and recreational programs. While the current deficit would have to be addressed by the development of parkland by the City, new development under the *General Plan* will be required to provide for parks and therefore will not add to the deficit.

The impact of the *General Plan* on parks and recreation facilities in Patterson is, therefore, considered to be less-than-significant.

### 4. Mitigation Measures

None required.

## C. HISTORIC RESOURCES

Patterson includes numerous historic buildings and residences. One building, the Carnegie Library, is listed on the National Register of Historic Places. Three other sites (the Plaza Building, Del Puerto Hotel, and palm tree-lined East Las Palmas Avenue) are listed on the State Register of Historic Places.

### 1. Implications of the General Plan Land Use Diagram

Growth and development in accordance with the *General Plan Land Use Diagram* could result in the demolition or alteration of historically significant buildings, particularly in the historic downtown and surrounding neighborhoods. In addition, new construction could occur in a manner which detracts from or is disharmonious with designated historic buildings and sites.

### 2. General Plan Policy Response

The *General Plan* contains the following policies to preserve and enhance the city's historic heritage:

- V.D.1. The City shall set as a high priority the protection and enhancement of Patterson's historically and architecturally significant buildings.
- V.D.2. The City shall establish a historic district in the downtown area and along East Las Palmas Avenue and develop standards for preservation and rehabilitation of historic structures and compatible infill development. New development near designated historic landmark structures and sites shall be designed to be compatible with the character of the designated historic resource.

- V.D.3. The City shall work with property owners in seeking registration of historical structures and sites as State Historic Landmarks or listing on the National Register of Historic Sites.
- V.D.4. The City shall support the efforts of property owners to preserve and renovate historic and architecturally significant structures. Where such buildings cannot be preserved intact, the City shall seek to preserve the building facades.
- V.D.5. Structures of historical, cultural, or architectural merit which are proposed for demolition shall be considered for relocation as a means of preservation. Relocation within the same neighborhood or to another compatible neighborhood shall be encouraged.
- V.D.6. The City shall explore the possibility of establishing a living history center or museum to focus on Patterson's agricultural heritage.

### **3. Impacts**

Development and redevelopment in the city could result in the demolition or alteration of historically significant buildings. The *General Plan* includes policies to preserve historic and architecturally-significant sites from development and redevelopment. The impacts on historic resources are therefore deemed to be less-than-significant.

### **4. Mitigation Measures**

None required.

## **D. ARCHAEOLOGICAL RESOURCES**

The Central California Information Center of the California Archaeological Inventory at Stanislaus State University completed a record search for Patterson in 1986 which revealed no recorded archaeological Native American sites in the Planning Area.

Prehistoric archaeological sites in the Patterson area tend to be located along watercourses. Patterson contains numerous unsurveyed areas, and much of the ground has been disturbed by agricultural tillage, so it is possible that there are archaeological resources within the Planning Area.

### **1. Implications of the General Plan Land Use Diagram**

Excavation in conjunction with new construction or placement of underground utilities could disrupt, damage, or completely destroy buried items of archaeological significance. Likewise, new structures could be placed unknowingly over buried archaeological features, thus making discovery, identification, and ultimate preservation unlikely. Farming activities may have already destroyed surface signs of archaeological sites.

### **2. General Plan Policy Response**

The *General Plan* contains the following policies to protect archaeological resources in the city:



- V.F.1. The City shall refer development proposals that may adversely affect archaeological sites to the California Archaeological Inventory, Central California Information Center, at Stanislaus State University, for review and comment.
- V.F.2. The City shall not knowingly approve any public or private project that may adversely affect an archaeological site without first consulting the California Archaeological Inventory, Central California Information Center, conducting a site evaluation as may be indicated, and attempting to mitigate any adverse impacts according to the recommendations of a qualified archaeologist. City implementation of this policy shall be guided by Appendix K of the State CEQA Guidelines.

### 3. Impacts

The *General Plan* includes policies to protect archaeological resources from disruption by new development. The impacts of the *General Plan* on archaeological resources are therefore deemed to be less-than-significant.

### 4. Mitigation Measures

None required.



## CHAPTER VII

### NATURAL RESOURCES

#### A. INTRODUCTION

This chapter assesses the impacts of the General Plan on water resources, agricultural land and soils, biological resources (including vegetation, wildlife, and fisheries) and air quality. Existing natural resources are described in Chapter VIII of the *General Plan Background Report*.

#### B. WATER RESOURCES

The important water resources in and around the Planning Area include the San Joaquin River, Salado Creek, and the local groundwater basin. A number of drainage canals also traverse the Planning Area. Groundwater currently supplies the potable water for the city.

##### 1. Implications of the General Plan Land Use Diagram

Development under the *General Plan* will have implications for both surface and groundwater resources in and near the Planning Area.

##### Surface Water

Although the City now has minimal stormwater drainage facilities, the *General Plan Policy Document* recommends the development of a gravity-flow storm drainage system capable of accommodating a 100-year storm (see discussion in "Drainage" section of Chapter V, Public Facilities and Services). As a result, development under the *General Plan* could affect water quality in the San Joaquin River through the short-term increases in pollutant discharges resulting from construction and grading activities, and the long-term increase in discharges of pollutants resulting from the increased use of automobiles and development of roadways, parking lots, corporation yards, landscaped areas, and other urban features.

Construction and grading activities from development under the *General Plan* could temporarily increase discharges of pollutants to surface waters. Some increase in sediment discharge usually results from ground disturbances associated with construction and grading. The low erosion hazard characteristic of soils in the planning area, however, should limit sediment runoff. Discharges to surface waters of other construction-related pollutants, including cement, oil, and solvents, are likely have a more adverse effect.

Development under the *Land Use Diagram* could also cause a long-term increase of pollutants in stormwater discharges. Runoff from streets, parking lots, corporation yards, and landscaped areas typically contain pollutants such as oil, grease, heavy metals, pesticides, fertilizers, and sediment. Discharges of farm pollutants (e.g., herbicides, insecticides, fertilizers, oil, and sediment) would decrease as farmland is developed with urban uses, partially offsetting increased pollutants from urban runoff.

Surface water also could be affected by increased discharges of treated wastewater to the San Joaquin River. Although the City now discharges its treated wastewater to evaporation ponds, the increased growth in population and industrial activities would necessitate the expansion of the City's treated



wastewater system and could involve the discharge of secondarily treated wastewater to the San Joaquin River.

## Groundwater

Converting farmlands in the Planning Area to urban uses would alter the kinds of pollutants that are potentially present in groundwater. Infiltration of farm chemicals and the downward leaching of salinity, primarily from lands currently producing field and row crops, would be reduced. Although reduced infiltration due the increase in impervious surfaces would result, it is expected that urban contaminant discharges to groundwater would increase. The potential for contamination of groundwater from urban sources would be greatest during construction and grading activities.

The increase in impermeable surfaces, the elimination of irrigation in newly urbanized areas, and the construction of a storm drainage system could tend to lower the water table in the vicinity of the Planning Area. As the high water table in the perched aquifers has historically created problems for agricultural production by causing saturation of the root zone, this could be considered a beneficial effect on adjacent agricultural uses.

## 2. General Plan Policy Response

The *General Plan* includes the following policies to address the implications of development on water resources:

- IV.A.1. The City shall continue to use groundwater as the principal source of domestic water for the City. The City shall also pursue, as expeditiously as possible, acquisition of surface water rights to supplement its water supply in order to accommodate projected water demand and provide for water supply security.
- IV.A.2 The City shall expand and develop water treatment, distribution, and storage facilities to accommodate the needs of existing and planned development.
- IV.A.3 The City shall coordinate, to the extent feasible, with other agencies involved in water resource development in the region.
- IV.A.4 To minimize the need for the development of new water sources and facilities and to minimize sewer treatment needs, the City shall promote water conservation both in City operations and in private development.
- VI.A.1 The City shall prohibit the establishment of any new septic systems within areas where City sewer and water service will be available in the foreseeable future.
- VI.A.2 The City shall seek the elimination of existing septic tanks in urbanized areas.
- VI.A.3 In reviewing major new development proposals, the City shall consider the project's potential for adversely affecting water quality in the San Joaquin River and the areas groundwater resources.

- VI.A.4 The City shall regularly monitor water quality in City wells for evidence of toxics, saltwater intrusion, and other contaminants.
- VI.A.5 The City shall utilize the CEQA process to identify and avoid or mitigate potential groundwater pollution problems resulting from new commercial and industrial development.
- VI.A.6 The City shall support efforts at the county, regional, and state wide levels to reduce runoff of toxic agricultural chemicals into Salado Creek and the San Joaquin River.
- VI.A.7 The City shall implement measures to minimize the discharge of sediment into Salado Creek and the San Joaquin River.
- IV.C.6 Future drainage system discharges shall comply with all applicable state and federal pollution discharge requirements.

Aside from local regulations, state and federal agencies exercise authority over water quality in Patterson. The Central Valley Regional Water Quality Control Board establishes discharge requirements for activities which could affect surface or groundwater in the Patterson area.

### 3. Impacts

Development under the *General Plan* could temporarily increase pollutant discharges to surface waters from construction and grading. Long-term increases in stormwater discharges of pollutants could also result from the increased development and use of roadways, parking lots, corporation yards, landscaped areas, and other urban features. Discharges of farm pollutants would decrease as farmland is converted to urban uses, partially offsetting the effects of increased urban runoff. The future addition of treated wastewater to the San Joaquin River could also potentially degrade water quality in the river.

Since California water quality planning is in a state of reevaluation, it is unclear how institutional considerations (i.e., future discharge requirements) could affect the City's option to discharge treated wastewater to the San Joaquin River. The *General Plan Policy Document* includes policies, however, that would minimize any potential impacts. The impacts of the *General Plan* on water quality would, therefore, be less-than significant.

Urbanization of lands in the Planning Area would increase urban contaminant discharges into the groundwater basin. Since development accommodated by the *General Plan* would decrease the infiltration of agricultural contaminants, however, the overall impact is considered less-than-significant.

### 4. Mitigation Measures

None required.

## C. SOILS AND AGRICULTURE

The Planning Area includes more than 3,000 acres of land dedicated to agriculture, representing nearly 70 percent of the Planning Area. The principal crops are almonds, walnuts, beans, alfalfa, apricots, and tomatoes. The soils in the Planning Area are Class I and II soils according to the U.S. Soil Conservation Service's Important Farmland Inventory.

### 1. Implications of the General Plan Land Use Diagram

#### Soils

Development under the *General Plan* could cause a temporary increase in erosion from grading and construction activities associated with land development. Because soils in the Planning Area have a low erosion hazard, and because the displacement of agriculture would eliminate a significant source of erosion, these impacts would be of a short-term nature only.

Buildout of the *General Plan* would result in the conversion of over 3,000 acres of high quality agricultural land to urban uses. The great majority of the soils in the Planning Area have been classified by the U.S. Soil Conservation Service (SCS) as Class I and II soils. Although typical agricultural impact analysis generally includes discussions of prime farmlands, the California Department of Conservation's Farmland Mapping and Monitoring Program, which delineates the extent of prime and other important farmlands, has not yet surveyed the Patterson Planning Area. However, the SCS Classes are also considered a good measure of soil suitability for agriculture. Table VII-1 shows the relationship of the SCS classes to agricultural suitability.



TABLE VII-1

## SOIL CONSERVATION SERVICE CAPABILITY CLASSIFICATIONS

- Class I      Soils that have few limitations that restrict their use.
- Class II     Soils that have some limitations that reduce the choice of plants or that require special conservation practices, or both.
- Class III    Soils which have severe limitations that reduce the choice of plants, require special conservation practices, or both.
- Class IV    Soils that have very severe limitations that reduce the choice of plants, require very careful management, or both.
- Class V     Soils that are not likely to erode but have other limitations, impractical to remove, that limit their use largely to pasture, range, woodland, or wildlife habitat.
- Class VI    Soils that have severe limitations that make them generally unsuited to cultivation and limit their use largely to pasture, range, woodland, or wildlife habitat.
- Class VII    Soils that have very severe limitations that make them unsuited to cultivation and restrict their use largely to pasture, range, woodland, or wildlife habitat.
- Class VIII   Soils and landforms that have limitations that preclude their use for commercial plants and restrict their use to recreation, wildlife habitat, water supply, or aesthetic purposes.

Source: Soil Conservation Service, 1977

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**Agriculture**

Urban encroachment on farming areas could create land use conflicts between urban residents and farmers. From the farmers' perspective, urban encroachment could make pesticide application and burning activities more difficult because of resistance from urban residents, and production costs could increase because of rising land costs water scarcity, theft and vandalism of farming equipment, crop pilferage, road congestion, and personal injury liability associated with farm trespass. From the perspective of the urban residents of the newly urbanized areas, adjacent farming activities increases nuisances and health risks associated with the unpleasant and hazardous aspects of farming. Effects of farming on adjacent urban uses can include dust, pesticides, odor, and noise.

Urban encroachment into farming areas could decrease the profitability of farming operations and could induce more rapid growth than desired by encouraging additional losses of cropland to urban development.

Cropland acreage designated for urban uses and their corresponding gross production values for 1988 are shown in Table VII-2. Although these figures are from 1988, they indicate that growth within the *General Plan* time frame could reduce the potential agricultural value of the county's annual gross farm production by approximately 0.5 percent. This initial value of the areas farm product has a ripple, or multiplier, effect in the areawide economy by generating related activities such as food processing, retail and wholesale trade, and transportation. Table VII-3 estimates the direct and indirect effects for most of the primary agricultural products grown in the Planning Area in 1988.

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**TABLE VII-2**  
**1988 ACREAGE AND GROSS CROP VALUES**  
**Patterson Planning Area\***

Crop Type	Acres	\$/Acre	Gross Value
Beans	818	\$ 969	\$ 792,642
Apricots	819	2494	2,042,586
Tomatoes	323	3,179	1,026,817
Walnuts	328	1,280	419,840
Almonds	107	1,750	187,250
Grain/Hay Crops	54	225	12,150
Melons/Squash/Cucumber	71	1,714	121,694
Alfalfa and Mixtures	18	630	11,340
Mixed Pasture	24	130	3,120
Misc. Crops	9	165	1,485
Corn	5	450	2,250
<b>Total</b>	<b>2,576</b>		<b>\$4,621,174</b>

\*Does not include idle lands, areas of native vegetation, or immature tree crops

Source: Department of Water Resources, 1988; Stanislaus County Department of Agriculture, 1989

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TABLE VII-3

**TOTAL 1988 COUNTYWIDE ECONOMIC BENEFIT OF CROPS  
PRODUCED IN THE PATTERSON PLANNING AREA\***

<b>Crop</b>	<b>1988 Value(\$)</b>	<b>Multiplier</b>	<b>Total Economic Benefit Generated in County</b>
Beans	\$1,082,000	2.4	\$ 2,596,807
Apricots	2,792,586	3.5	9,774,746
Tomatoes	1,128,431	10.8	12,187,059
Walnuts	531,200	3.2	1,699,840
Almonds	187,250	2.5	468,125
Grains/Hay	N/A	--	--
Melons/Squash/Cucumber	N/A	--	--
Alfalfa	61,740	2.4	148,176
Pasture	5,349	2.4	12,837
Nursery	297,320	2.9	862,228
<b>Total</b>	<b>\$6,086,078</b>		<b>\$27,749,818</b>

\*Includes reserve and non-reserve lands

Source: University of California Cooperative Extension

Development according to the *General Plan* would also involve urbanizing lands which are now under Williamson Act contracts, either through nonrenewal or cancellation.

## **2. General Plan Policy Response**

The *General Plan* includes the following policies to minimize the impacts of development on agriculture and discourage premature development of agricultural lands with urban uses:

- VI.B.1 The City shall support the continuation of agriculture use on lands designated for urban uses until urban development is imminent.
- VI.B.2 The City shall encourage the County to retain agricultural uses on lands surrounding the Planning Area and on lands within the Planning Area pending their annexation to the City or development by mutual agreement with the County.



- VI.B.3 The City shall support tax and economic incentives, at both the local and state levels, to enhance the economic competitiveness of agriculture.
- VI.B.4 The City shall allow and encourage activities that support activities that support local agriculture such as farmer's markets, on-site sale of produce, and special events promoting local agricultural products.
- VI.B.5 The City shall allow cancellation of Williamson Act contracts only if the City Council finds that cancellation is consistent with state law.
- VI.B.6 The City shall adopt a right to farm ordinance.
- VI.B.7 The City shall support economic programs established by the County for farm preservation.
- VI.B.8 Where necessary to promote planned city growth, the City shall encourage development of those agricultural lands that are already compromised by adjacent urban development or contain property required for the extension of infrastructure or other public facilities, before considering development on agricultural lands that are not subject to such urban pressures.

### 3. Impacts

Development under the *General Plan* could cause temporary increases in erosion from grading and construction activities associated with land development. Because the erosion hazard of soils in the Planning Area is low, and because displacement of agriculture would eliminate a significant source of erosion, this impact is considered less-than-significant.

Buildout of the *General Plan* would allow for conversion of approximately 3,000 acres of primarily Class I and II soils to urban uses. Conversion of the Planning Area's high quality soils constitutes a significant adverse impact that cannot be mitigated without designating these lands for agricultural uses.

In addition, the *General Plan* could induce growth in agricultural areas adjacent to the Planning Area, particularly along the southern boundary of the Planning Area as a result of the southern bypass expressway. This potential for growth inducing impacts on high-quality agricultural lands is considered a potentially significant impact.

Development under the *General Plan* would involve the nonrenewal or cancellation of Williamson Act contracts. Cancellation of Williamson Act contracts would be considered a significant adverse impact. Although the policies listed above would help to control the rate and pattern of Williamson Act contract cancellation, no mitigation is available that would reduce this impact to a less-than-significant level."

### 4. Mitigation Measures

The only way to mitigate the conversion of agricultural lands would be to remove land from the Planning Area or designate the lands for agricultural uses. The loss of agricultural lands is, therefore, a significant adverse impact that cannot be mitigated to a less-than-significant level.

As stated previously, although implementation of *General Plan* policies would help to reduce the impact of Williamson Act contract nonrenewal and cancellation, no mitigation is available to reduce the impact to less-than-significant levels. Similarly, no mitigation is available to reduce to less-than-significant levels the impacts of growth inducement on lands under Williamson Act contract.

The alignment of the southern bypass expressway along the southern Planning Area boundary could, over the long-term, have a growth-inducing impact on lands south of the bypass. This land is outside the Planning Area and is not considered for urban development as part of the *General Plan*. Any such urban development would, however, result in the premature conversion of agricultural lands in this area. This is considered a potentially significant impact, which could be mitigated by moving the alignment of the roadway further to the north.

## D. BIOLOGICAL RESOURCES

Biological resources within the Planning Area occur in both natural and altered habitats. Natural habitats constitute less than five percent of the Planning Area and include riparian areas along Salado Creek and various drainage canal and small areas of valley grassland scattered throughout the Planning Area. Altered habitats include cultivated and residential areas. Of the areas not urbanized, more than 90 percent of the Planning Area is either cultivated or grazed. Although subject to human disturbance, these altered areas may still be valuable for wildlife.

Habitat descriptions are given in Chapter VIII of the *General Plan Background Report*. The *Background Report* also lists the special status plant and animal species which could potentially inhabit the Planning Area.

### 1. Implications of the General Plan Land Use Diagram

Development under the *General Plan Land Use Diagram* could directly and indirectly affect biological resources. These resources could be directly affected by the following activities:

- Conversion to urban uses of "natural areas" and the subsequent loss of the remaining wildlife habitats or uncommon plant communities,
- Reduction in the numbers of special-status plant and wildlife species and populations and/or the extent of their habitats, and
- Vegetation removal for canal and river maintenance.

Increased human population density and the potential for disturbance and degradation of natural habitats and species can also indirectly affect biological resources.

### Development of Habitat Areas

Development under the *General Plan Land Use Diagram* has the potential to eliminate the remaining important natural habitats. These habitat areas are important because they could support special-status plant and animal species and support locally and/or regionally uncommon plants and animals that are



threatened with continued loss. They provide the only remaining natural habitat for particular species of native plants and wildlife species in the Planning Area and they could have aesthetic, research, or educational value or are representatives of our natural heritage.

Riparian Areas: The California Fish and Game Commission and the U.S. Fish and Wildlife Service recommend, and where possible require, no net loss of riparian habitat to maintain populations of dependant plant and wildlife species at existing levels. Studies by both of these agencies have documented the extent of past impacts and the present precarious nature of many riparian dependant species. Riparian habitats are scarce in the Patterson Planning Area, which gives them substantial local importance.

Annual Grasslands: There are a number of small areas of annual grasslands interspersed throughout the Planning Area. The California Department of Water Resource's land use maps indicate that growth under the *Land Use Diagram* could disturb approximately 30 acres of native grassland; 11 acres of which are designated as Residential Reserve in the northeast portion of the Planning Area. These areas represent uncultivated areas surrounded by large tracts of agricultural land, and have value as raptor foraging habitat and for other predators seeking small animals and insects.

Old Fields: Old fields (fields which have been fallow for at least several years) provide habitat for many species typically found in annual grasslands and open space habitats. Although this habitat is typically degraded, old fields provide breeding and foraging habitat for raptors and other birds, mammals, and reptiles.

Cultivated Areas: The agricultural fields which dominate the Planning Area have little value as wildlife habitat compared with natural habitat but do provide nesting and foraging habitat for a variety of wildlife species that exist in the Patterson area. Agricultural fields are particularly important as foraging habitat for raptors and as roosting habitat for wintering waterfowl. Loss of these lands would be detrimental to those raptors which have become dependant on certain types of crops and cropping patterns.

Urban Lands: Urbanized lands would increase under the *General Plan*. Although some new urban wildlife habitat would be created, it would be of less value to wildlife than the habitat listed above.

### **Conversion or Elimination of Habitat for Special-Status Species**

None of the special-status plants listed in the *General Plan Background Report* are known to occur within the Planning Area. Although the Planning Area is within the range of several special-status plants, the Delta-coyote thistle and the diamond-petaled California poppy, suitable habitat for these species does not exist in the Planning Area.

Of the special-status wildlife species listed in the *General Plan Background Report*, four have the potential to experience meaningful losses in breeding or foraging habitat attributable to development under the *General Plan Land Use Diagram*. These are the Swainson's hawk, burrowing owl, giant garter snake, and valley elderberry longhorn beetle. Each of these species could suffer direct habitat loss from development under the *General Plan Land Use Diagram*. The Planning Area is located within the range of various other special-status species including the black-shouldered kite, Cooper's hawk, merlin, northern harrier, short-eared owl, golden eagle, Aleutian Canada goose, greater sandhill crane, western yellow-billed cuckoo, blunt-nosed lizard, and San Joaquin kit fox. Development under the *General Plan*, however, would not substantially affect these species because site conditions in the Planning Area are either not



conducive to the presence of these species or the amount of habitat lost to urbanization would not be substantial.

Swainson's Hawk: Although the Planning Area has little potential as breeding habitat for this species, development under the *General Plan* would result in loss of a substantial amount of agricultural land, much of which is suitable Swainson's hawk foraging habitat.

The Swainson's hawk population in California has declined by an estimated 90 percent. Historically, this species foraged in the large, open grasslands of the Central Valley. Loss of nesting and foraging habitat due to conversions of woodlands and grasslands to agricultural uses is the primary cause of the species' decline. More recently, Swainson's hawk nesting and foraging habitats in farmland areas are lost when agricultural uses are converted to urban uses. The loss of farmland under the *General Plan* would contribute to the cumulative loss of Swainson's hawk foraging habitat regionally and could incrementally reduce the regional breeding population.

Giant Garter Snake: This species, which is state-listed as threatened and a candidate for federal listing has a moderate potential for occurring in the Planning Area. Since the giant garter snake is known to use drainage canals and adjacent grassy, open areas, development of these areas would be detrimental to this species, if any were present in Planning Area.

San Joaquin Kit Fox: Suitable habitat for this species is predominant west of I-5, outside the Planning Area. Although not typical, San Joaquin kit fox have been observed denning in a walnut orchard and adjacent to an alfalfa field in the San Joaquin Valley. If the species is observed in the agricultural areas of the Planning Area, the conversion of these areas could be considered loss of kit fox habitat.

Valley Elderberry Longhorn Beetle: This federal-listed threatened species occurs in riparian habitat that includes the valley elderberry. If this habitat occurs within the Planning Area, development indicated by the *General Plan Land Use Diagram* could adversely affect this species.

## 2. General Plan Policy Response

The *General Plan* includes the following policies to address the implications of development on biological resources:

- VI.C.1. The City shall encourage and support development projects and programs that enhance public appreciation and awareness of the natural environment.
- VI.C.2. The City shall support state and federal laws and policies to preserve populations of rare, threatened, and endangered species by ensuring that development does not adversely affect such species or by fully mitigating adverse effects.
- VI.C.3. Unless there are significant, overriding considerations, the City shall not approve projects that would cause unmitigatable impacts on rare, threatened, or endangered wildlife or plant species.
- VI.C.4. The City shall support and participate in local and regional attempts to restore and maintain viable habitat for endangered plant and animal species.

- VI.C.5. The City shall work with the California Department of Fish and Game in identifying a regional area or areas suitable for Swainson's Hawk habitat; this land should be designated as a potential mitigation land bank for impacts on existing habitat for these species.
- VI.C.6. The City, and other government agencies, shall investigate a mechanism for funding acquisition and management of lands in the potential mitigation land bank.
- VI.C.7. The City shall promote the use of native plants, especially valley oaks, for landscaping roadsides, parks, and private properties.
- VI.C.8. Golf course development shall incorporate, where feasible, areas of native vegetation and wildlife habitat.

### 3. Impacts

Because of the low quality or negligible regional value of natural habitat areas within the Planning Area, they are not in themselves important. They do, however, represent viable habitat for the species discussed below. In that the importance of these areas is directly related to their ability to support special-status species, CEQA findings have been relegated to the discussions of the various species.

Valley Elderberry Longhorn Beetle: Development which would occur according to the *General Plan* could have the potential to adversely affect the valley elderberry longhorn beetle, if individuals or suitable habitat were present in the area. The *General Plan*, however, includes policies which would reduce these impacts to less-than-significant levels.

Swainson's Hawk: Development under the *General Plan* could have a significant adverse effect on the Swainson's hawk, a state-listed threatened species. Losses of Swainson's hawk breeding territories are extremely difficult to mitigate on a project-by-project basis or even a jurisdiction-by-jurisdiction basis. Establishing buffer areas around known nesting sites is often inadequate to avoid nest abandonment unless the buffer includes extensive suitable foraging habitat. The cost of setting aside buffer areas of this size is usually prohibitive for individual development.

The California Department of Fish and Game (DFG) recommends mitigation for losses of Swainson's hawk foraging habitat for all development projects that eliminate suitable habitat within 10 miles of a breeding territory. The current DFG policy is a foraging habitat replacement ratio of 1.0 to 1.0.

San Joaquin Kit Fox: The U.S. Fish and Wildlife Service and DFG have stated that orchards and other agricultural lands may provide habitat for the kit fox under special conditions. Development under the *General Plan* could convert a considerable amount of orchard and other agricultural land to urban uses. This potential impact is considered less than significant because orchards and other agricultural fields are not considered typical San Joaquin kit fox habitat, and because the *General Plan* contains policies that would require site-specific surveys for all development projects, and would require protection of all special-status species.

Burrowing Owl: If individuals of this species are present at the time and place of future development, then growth which could occur according to the *General Plan* would adversely affect this species. The

*General Plan*, however, includes goals and policies that would reduce these impacts to less-than-significant levels.

Giant Garter Snake: Development which would occur according to the *General Plan* could have the potential to adversely affect the giant garter snake, if individuals were present in the area. The *General Plan*, however, includes policies which would reduce these impact to less-than-significant levels.

#### 4. Mitigation Measures

None required.

### E. AIR QUALITY

Stanislaus County is one of the eight counties within the San Joaquin Valley air basin. This entire air basin has been designated a nonattainment area for both PM10 and ozone. Patterson does not have any local problems with carbon monoxide. Detailed information regarding air quality conditions in the Planning Area are addressed in detail in Chapter VIII of the *General Plan Background Report*.

The new California Clean Air Act (AB 2595) has substantially added to the authority and responsibilities of air pollution control districts (APCD). In March 1991, the eight counties formed the San Joaquin Unified Air Pollution Control District, replacing the local county air pollution control districts. The San Joaquin Unified Air Pollution Control District is preparing its Air Quality Management Plan, pursuant to AB 2595. Although the new legislation does not alter air quality standards, AB 2529 requires APCDs to prepare air quality plans, and gives the APCDs the authority to implement transportation control measures and indirect source review rules.

#### 1. Implications of the General Plan Land Use Diagram

Development under the *General Plan* would degrade both local and regional air quality. The air quality effects of development would be direct and indirect. Direct effects are due to emission releases from stationary sources such as stacks, chimneys, vents, and fume hoods. Indirect effects are due to automobile traffic generated by new land uses.

#### Effects on Local Air Quality Problems

Generally, local air quality problems are associated with carbon monoxide (CO), the primary source of which is automobile traffic. Violations of state and federal CO standards are usually associated with intersections and roadway segments which operate at traffic levels of service of D or worse, with the propensity for violations more likely the worse the level of service. Intersections of major surface streets are considered hot spots for carbon monoxide, due to high traffic volumes and vehicle idling due to delays at intersections.

With development that would occur under the *General Plan Land Use Diagram*, the number and extent of carbon monoxide-producing uses would increase.



## Effects on Regional Air Quality

Ozone: The growth in emissions associated with development under the *General Plan* would contribute to the continuation of ozone problems in the San Joaquin Valley Maintenance Area.

Ozone, the main component of photochemical smog, is primarily a summer and fall pollution problem. Ozone is not emitted directly into the air, but is formed through a complex series of chemical reactions involving other components that are directly emitted, the most important of which are reactive organic gases (ROG) various oxides of nitrogen ( $\text{NO}_x$ ). The time required for ozone formation allows the reacting compounds to be spread over a large area, producing a regional problem. New additions of ROG and  $\text{NO}_x$  would represent an obstacle to attaining the state ozone standard in the San Joaquin Valley Air Basin.

The primary effect of development under the *General Plan Land Use Diagram* would be due to vehicle trips associated with new development. Trips to, from, and within Patterson would result in increased air pollution problems. In addition to emissions from vehicles, development under the *General Plan Land Use Diagram* would increase regional emissions through new area sources and stationary sources. Residential development is often considered an area source in that it contains a number of dispersed and intermittent sources of pollutants such as space and water heaters, household paints and solvents, fireplaces and wood stoves, lawn mowers, and other equipment.

Development under the *General Plan* would also result in substantial new industrial and commercial growth. Industrial development, and to a lesser extent commercial development, can include new stationary sources of air pollutants. Industrial land uses may include emissions from a multitude of different processes and may involve the use of toxic air pollutants. Commercial land uses may include smaller stationary sources such as cooking equipment, boilers, and dry cleaning equipment, and in some cases may involve the use of toxic air contaminants.

The type, number, and amount of new stationary emissions allowed under the *General Plan* is not predictable. Each new source, however, will be required to obtain a permit from the Stanislaus County APCD prior to construction and operation.

PM10: Fine airborne particulate matter, known as PM10, is also a problem both locally and regionally. The majority of the San Joaquin Valley's eight counties are in violation of the federal and state standards for PM10. The California Air Resources Board (ARB) estimates that farming operations account for a substantial portion of all the PM10 generated in Stanislaus County. Since development under the *General Plan* would reduce the extent of farming operations in the Planning Area and therefore the amount of fugitive dust created by these activities, development under the *General Plan* would reduce PM10 emissions in the Planning Area.

## 2. General Plan Policy Response

The *General Plan* contains policies and goals designed to reduce the air quality impacts of future development. The effectiveness of these measures in improving air quality will largely depend on how these policies and goals are implemented and how consistently and aggressively they are applied to future development as it is proposed.

The *General Plan* includes the following policy statements:

- VI.D.1 The City shall work with the San Joaquin Unified Air Pollution Control District in an effort to ensure the earliest practicable attainment and subsequent maintenance of federal and state ambient air quality standards.
- VI.D.2 The City shall utilize the CEQA process to identify and avoid or mitigate potentially significant air quality impacts of new development. The CEQA process shall also be used to ensure early consultation with the San Joaquin Unified Air Basin Authority concerning air quality issues associated with specific development proposals.
- VI.D.3 The City shall notify and coordinate with the San Joaquin Unified Air Basin Authority when industrial developments are proposed. Such coordination will assist applicants in complying with applicable air quality regulations and will assist the City in promptly identifying and resolving potential air quality problems.
- VI.D.4 Major intersections shall be designed to minimize long vehicle delays which result in carbon monoxide (CO) "hot spots."
- VI.D.5 The City shall, to the extent practicable, separate sensitive land uses from significant sources of air pollutants or odor emissions.
- VI.D.6 The City shall promote the expansion of employment opportunities within Patterson to reduce commuting to areas outside Patterson.

### 3. Impacts

Development under the *General Plan* would cause levels of carbon monoxide to rise on most roadway segments and intersections in Patterson. The traffic analysis in Chapter IV of this *EIR* indicates, however, that with the improvement included in the *Circulation Plan Diagram* and *Policy Document*, nearly all roadway segments and intersections are expected to function at Level of Service C or better, with the exception of the three roadway segments described in Chapter IV. Since violations of carbon monoxide standards are usually associated with roadways and intersections which operate at level of service D or worse, the localized increases in carbon monoxide are considered a less-than-significant impact. Even along the three roadway segments where peak hours slightly exceed Level of Service C, since these are relatively short roadway segments where the Level of Service C would only be slightly exceeded for a short period of time, it is considered a less-than-significant impact.

Estimates of mobile source emissions resulting from development under the *General Plan* Land Use Diagram were made using a program developed by the ARB called URBEMIS3. URBEMIS3 is a program that estimates the emissions that result from land use development projects. For a list of assumptions made during analyses and for a description of how the assumptions were developed, see Appendix E.

Since no data exists for Patterson regarding commute patterns, making assumptions for input to URBEMIS3 was somewhat problematic. The most prominent issues relate to the percentage of workers who travel to other employment centers on a daily basis and the distance from Patterson to these employment centers. For the purposes of this analysis, two scenarios made were devised, using ten- and five-mile average commute distances, respectively. The ten-mile figure assumes that a high percentage

of workers travel to employment centers on the east side of the San Joaquin Valley and in the Bay Area. The five-mile figure assumes that a smaller number trips were made to distant employment centers. The purpose of the five-mile scenario is to address the possibility that, with increased development and resulting job opportunities, a greater percentage of workers would find employment within Patterson. Both scenarios assume a 2011 time frame and do not include development that would occur beyond the time frame of the *General Plan*.

Table VII-4 lists the daily increase in emissions of ROG, CO, and NO<sub>x</sub> under the two scenarios. ROG emissions represent approximately 92 percent of the total organic gases (TOG) indicated in Table VII-2.

The increase in ozone precursor emissions under the *General Plan* under both scenarios would be substantial and would represent an obstacle to attaining the ozone standard in the San Joaquin Valley Air Basin. Because the basin is already a nonattainment area for federal and state air quality standards, any new development in the region will contribute to further delay in attaining the federal and state standards.

Even with the policies included in the *General Plan*, however, the increase in ozone precursor emissions from new development constitutes a significant adverse impact on regional air quality.



TABLE VII-4

**REGIONAL VEHICULAR AND RESIDENTIAL EMISSIONS**  
**From Development Under the General Plan**  
**in Pounds per Day**

Land Use	TOG	CO	PM <sub>10</sub>
<u>Scenario 2 (10-Mile Average Commute)</u>			
Composite Residential	564.7	5185.0	89.1
Neighborhood Commercial	93.6	864.4	46.0
Downtown Core	257.6	3301.3	175.7
Highway Service Commercial	3085.8	28537.3	2982.6
General Commercial	88.2	817.4	135.4
Medical/Professional Office	9.7	91.4	36.7
Light Industrial	307.5	2905.5	1159.4
Heavy Industrial	15.5	148.1	18.4
<u>Scenario 1 (5-mile Average Commute)</u>			
Composite Single/Multi Family	503.9	4690.4	63.5
Neighborhood Commercial	93.6	864.4	46.0
Downtown Core	357.6	3301.3	175.7
Highway Service Commercial	3085.8	28537.3	2982.6
General Commercial	88.2	817.4	135.4
Medical/Professional Office	9.7	91.4	36.7
Light Industrial	307.5	2905.5	1159.4
Heavy Industrial	15.5	148.1	18.4

TOG = Total Organic Gases (92% ROG)

CO = Carbon Monoxide

PM<sub>10</sub> = Particulate matter smaller than 10 microns

Source: Jones & Stokes Associates, 1991

#### 4. Mitigation Measures

The impact on regional air quality from the emission of ozone precursors could be reduced with the addition of the following policy to the adopted *General Plan* as Policy VI.D.7:

- VI.D.7. The City should review development projects using criteria established by the San Joaquin Unified Air Pollution Control District in order to minimize future increases in vehicle travel and to assist in implementing appropriate indirect source regulations adopted by the Air Pollution Control District.

The extent to which the addition of this policy would mitigate the impacts on regional air quality depends on the effectiveness of the regulations adopted by the San Joaquin Unified APCD in achieving attainment of federal and state air quality standards. Since the regulations have not been adopted or implemented at this time, even with the addition of this mitigation measure, the impact on regional air quality is still considered potentially significant.

## CHAPTER VIII

### HEALTH AND SAFETY

#### A. INTRODUCTION

This chapter provides an analysis of natural and man-made health and safety issues, including seismic and geologic hazards, flooding hazards, fire, and toxic materials hazards, emergency response, and noise. Existing health and safety issues are described in Chapter IX of the *General Plan Background Report*.

#### B. SEISMIC AND GEOLOGIC HAZARDS

The *General Plan Background Report* provides a generalized description of the seismic and geologic conditions affecting Patterson. Included are descriptions of local soil conditions, the proximity and historical activity of nearby faults, and the history and severity of earthquakes in the region. Past studies and evaluations of seismic hazards in the region indicate that Patterson is in an area of relatively low seismic activity. The principal geologic and seismic issues affecting the city are liquefaction, seiches, ground shaking, and levee failure caused by earthquakes.

##### 1. Implications of the General Plan Land Use Diagram

Growth and development will not increase the likelihood or severity of geologic and seismic hazards. Additional development will, however, result in the exposure of more people and property to these hazards. Presently, the most significant hazard is to older, unreinforced masonry structures and canal levees which could collapse during strong ground shaking.

Newer structures, while more resistant to ground shaking than older buildings, could suffer damage from shaking or settlement caused by liquefaction. Fire caused by ruptured gas or electrical transmission lines could affect both new and old structures.

##### 2. General Plan Policy Response

The *General Plan* contains the following policies to address potential implications of seismic and geologic hazards:

- VII.A.1. The City shall require preparation of geotechnical reports and impose appropriate mitigation measures to ensure, within the limits of technical and economic feasibility, that new structures are able to withstand the effects of seismic activity, including liquefaction.
- VII.A.2. Underground utilities, particularly water and natural gas mains, shall be designed to withstand seismic forces in accordance with state requirements.

##### 3. Impacts

While not eliminating the seismic and geologic hazard entirely, the policies of the *General Plan* provide for development with minimal risks from seismic and geologic hazards. Further, Patterson is an area of relatively low seismic risk.



The impacts of the *General Plan* for seismic safety are therefore considered to be less-than-significant.

#### 4. Mitigation Measures

None required.

### C. FLOODING

The City of Patterson lies to the west of San Joaquin River and is intersected by one of the San Joaquin River's west side tributaries, Salado Creek. The city and the surrounding farmlands have experienced flood problems along Salado Creek for more than 40 years. The city's Flood Insurance Rate Maps developed by the Federal Emergency Management Agency designates approximately 20 percent of the city as Flood Zone AH and AO. A narrow strip along Salado Creek is designated as Zone AE. Approximately 20 percent of the area is designated as Zone X. Definitions of flood zones are given below.

#### Special Flood Hazard Areas Inundated by 100-Year Flood

Zone AE: Base flood elevation determined

Zone AH: Flood depths of 1 to 3 feet (usually areas of ponding); base flood elevations determined

Zone AO: Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined.

#### Other Areas

Zone X: Areas of 500-year flood or outside the 500-year floodplain

A map of areas within the 100-year floodplain is shown in Figure VIII-1.

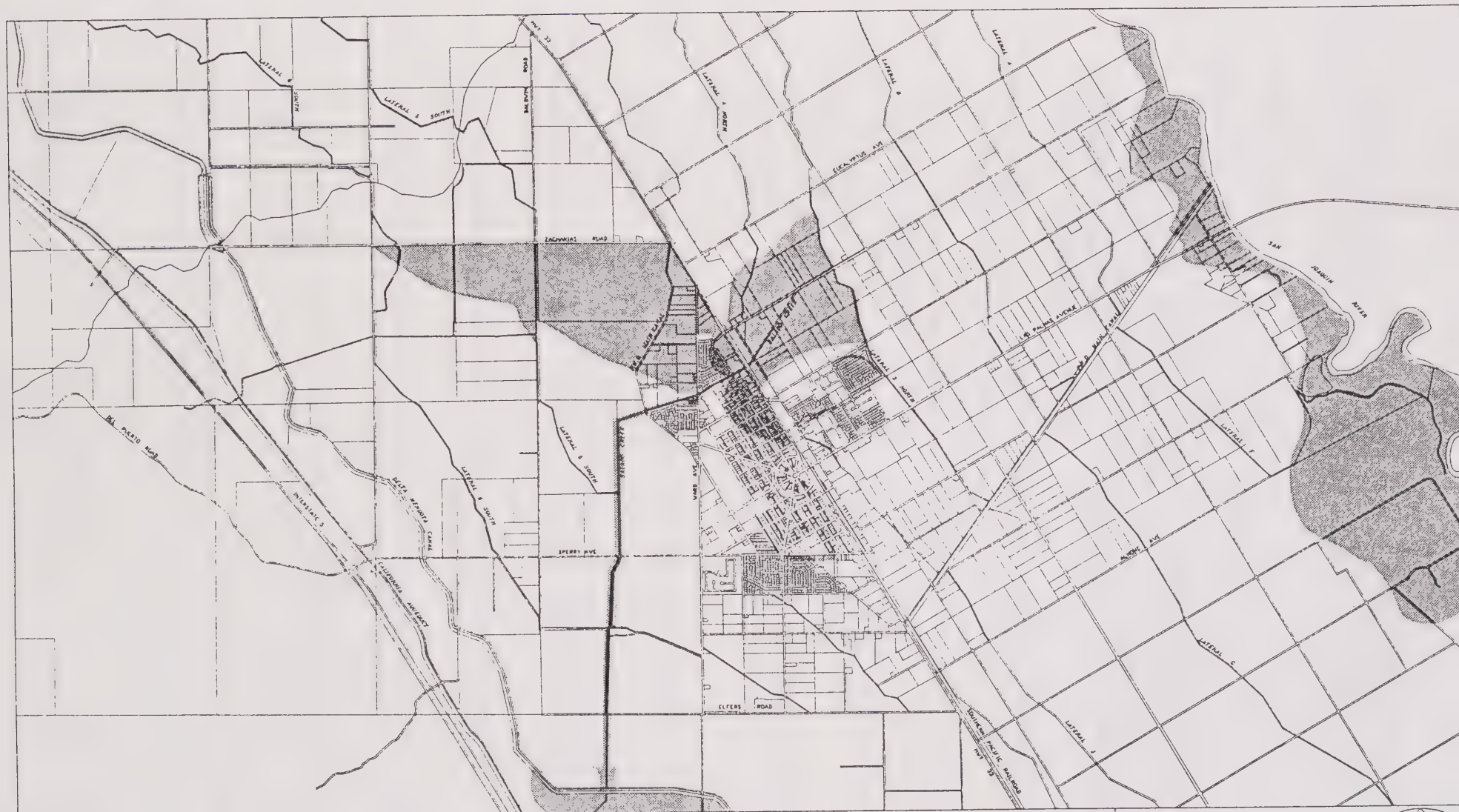
Several studies have been conducted concerning drainage problems relating to Salado Creek. The basic conclusion from all these studies is that there are not adequate gravity storm drain facilities to directly convey the entire storm water runoff from Salado Creek and Patterson to the San Joaquin River.

The City has prepared a comprehensive *Storm Drainage Master Plan*. The findings include potential flooding of the city not only from Salado Creek, but also from Black Gulch and Del Puerto Creeks.

#### 1. Implications of the General Plan Land Use Diagram

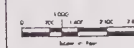
The analysis of the flood hazards affecting the community is based on information from the report for the city's Flood Insurance Rate Maps and other completed or in-progress studies.

Growth in accordance with the *General Plan* is not expected to significantly increase the likelihood of major flooding; however, development will cause additional people and property to be exposed to this

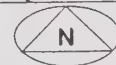


**FIGURE VIII-1**

**100-YEAR FLOODPLAIN**



Map was prepared by L. M. Gifford, Inc., July 1988



**Patterson  
Planning Area**

Source: Federal Emergency Management Administration: City of Patterson, November 1981; Stanislaus County Unincorporated Area, August 1988.





potential hazard. New development, primarily through the creation of additional impervious surfaces and changes in existing drainage patterns, could increase the occurrence of localized flooding during storms. This is discussed more fully in the drainage section of Chapter V, "Public Facilities and Services."

## **2. General Plan Policy Response**

The General Plan contains the following policies to address flooding:

- IV.C.1. The City shall develop a long term solution for flooding related to Salado Creek and Black Gulch Creek. The City shall seek the cooperation of Stanislaus County, Caltrans, Army Corps of Engineers, and local irrigation districts in developing this solution. The preferred solution consists of a positive flow system to the San Joaquin River designed to accommodate a minimum of 100-year storm, if feasible.
- IV.C.2. Where practical and economical, the City shall upgrade existing drainage facilities as necessary to correct localized flooding problems.
- IV.C.3. The City shall expand and develop storm drainage facilities to accommodate the needs of existing and planned development.
- IV.C.4. The City shall form storm drainage districts as needed to ensure that needed storm drainage facilities are properly constructed, operated, and maintained.
- IV.C.5. The City shall, through a combination of drainage improvement fees and other funding mechanisms, ensure that new development pays its share of the costs of drainage system improvements.
- IV.C.6. Future drainage system discharges shall comply with applicable state and federal pollutant discharge requirements.
- VII.B.1. The City shall continue to participate in the National Flood Insurance Program. To this end, the City shall ensure that its regulations are in full compliance with standards adopted by the Federal Emergency Management Agency.
- VII.B.2. New residential development, including mobilehomes, shall be constructed so that the lowest floor is at least 12 inches above the 100-year flood level.
- VII.B.3. Non-residential development shall be anchored and flood-proofed to prevent damage from the 100-year flood or, alternatively, elevated to at least 12 inches above the 100-year flood level.
- VII.B.4. Existing development shall comply with policies B.2 and B.3. when improvements are made costing at least 50 percent of the estimated current market value of the structure before the improvements.
- VII.B.5. Construction of storm drainage improvements shall be required, as appropriate, to prevent flooding during periods of heavy rainfall.

VII.B.6. The City shall impose appropriate conditions on grading projects performed during the rainy season to ensure that silt is not conveyed to storm drainage systems.

### **3. Impacts**

While not eliminating the potential for flooding, policies in the *General Plan* provide for minimizing flood hazards in conjunction with new development. In addition, the City adopted a floodplain management ordinance in 1988 which institutes development standards for construction within the designated floodplain. The impact of the *General Plan* in terms of flooding hazards would, therefore, be less-than-significant.

### **4. Mitigation Measures**

None required.

## **D. FIRE HAZARDS**

Patterson is subject to both structural and wildland fire hazards, as well as hazards posed by toxic chemicals which are used, produced, or stored at local industries. Certain agricultural chemicals are also hazardous.

Chapter IX of the *General Plan Background Report* discusses structures and areas deemed to be structural or wildland fire hazards.

### **1. Implications of the General Plan Land Use Diagram**

Growth and development under the *General Plan* will affect fire and hazardous materials in a number of ways. First, as agricultural and other open areas are developed, the potential for wildland or brush fire will decrease. Also, the use and transport of agricultural chemicals within the community will decrease. Second, as development occurs, more structures and persons will be subject to existing fire and toxic material hazards. Third, new residential, commercial and industrial development will create new potential fire sources. Finally, additional quantities of hazardous materials are likely to be transported to and from these new businesses.

### **2. General Plan Policy Response**

The *General Plan* Policy Document contains the following policies which address fire and hazardous materials:

VII.C.1. The City shall require that new development provides all necessary water service, fire hydrants, and roads consistent with Fire Department standards.

- VII.C.2. The City shall ensure that adequate water fire-flows are maintained throughout the city and shall regularly monitor fire-flows to ensure adequacy. New development shall comply with the following minimum fire-flow rates:

Development Category	Gallons Per Minute
Single-Family Residential	1,000
Multi-Family Residential	1,500
Principal Business District	2,500
Industrial/Other Business Districts	3,000 to 6,000

- VII.C.3. The Fire Department shall maintain an ongoing fire and life safety inspection program for all public, commercial, and industrial buildings.
- VII.C.4. All new development shall be constructed according to fire safety and structural stability standards contained in the latest adopted *Uniform Fire and Building Codes* and related regulations.
- VII.C.5. The City shall minimize the dependence of new commercial and industrial developments on City firefighting personnel and equipment by requiring on-site fire suppression systems which include sprinklers and pumps, as deemed necessary.
- VII.C.6. The City shall require property owners to remove fire hazards, including vegetation, hazardous structures and materials, and debris, as directed by the Fire Department.
- VII.C.7. The City shall ensure that new development provides for adequate fire equipment access and, where appropriate, includes the use of fire-resistant landscaping and building materials.

In addition, the *Stanislaus County Hazardous Waste Management Plan* provides for the transportation, storage, and disposal of hazardous materials throughout the county.

### 3. Impacts

The *General Plan* includes policies to address fire and hazardous materials in conjunction with new development. Therefore, the impacts are deemed to be less-than-significant.

### 4. Mitigation Measures

None required.

## E. EMERGENCY RESPONSE

The ability of residents, employees and designated City officials to respond to an emergency in an appropriate and timely manner could make a significant difference in the number of lives saved and injuries avoided in the event of a man-made or natural disaster or a military attack.



As described in the previous sections and the *General Plan Background Report*, there is potential for disaster from a number of natural and man-made sources. The City's method of addressing this potential is described in their *Emergency Response Plan*.

### **1. Implications of the General Plan Land Use Diagram**

Natural and man-made hazards associated with development under the *General Plan* are described in the preceding sections. Additional impacts which could affect the function of response measures in the *General Plan* include logistical complications brought about by the additional persons and vehicles that would have to be moved in an evacuation. Further, additional development will result in additional structures which could become impediments to travel in an emergency situation, particularly if they cause streets to be blocked.

### **2. General Plan Policy Response**

The *General Plan* Policy Document contains the following policies which address emergency response:

- VII.D.1. The City shall maintain, periodically update, and test the effectiveness of its Emergency Response Plan. As part of the periodic update, the City shall review county and state emergency response plans and procedures to ensure coordination with the City's plan.
- VII.D.2. The City shall identify emergency access routes and shall ensure that they are kept free of traffic impediments.
- VII.D.3. The City shall identify alternative water sources for firefighting purposes for use during a disaster.
- VII.D.4. Critical emergency response facilities such as hospitals, fire, police, emergency service facilities, and utilities shall be sited to minimize their exposure to flooding, seismic effects, fire, or explosion.
- VII.D.5. The City shall designate and develop a command center for use during times of emergency.
- VII.D.6. The City shall maintain mutual aid agreements and communications links with surrounding jurisdictions for assistance during times of emergency.

### **3. Impacts**

Continued reliance and update of the *Emergency Response Plan* should ensure that City emergency response procedures are adequate in the event of natural or man-made disasters. This impact is, therefore, considered to be less-than-significant.

### **4. Mitigation Measures**

None required.

## F. NOISE

The primary noise sources in the Patterson are roadways, the railroad, and industrial facilities. Exposure to excessive noise may interfere with normal speech and sleep activities of city residents. Industry can also be affected by encroachment of noise-sensitive uses.

### 1. Implications of the General Plan Land Use Diagram

The potential for noise conflicts from development under the *General Plan* includes additional and continuing excessive noise from transportation-related noise sources (roadways and railroads). Increased traffic volumes would produce higher noise levels in the vicinity of roadways. Table VIII-1 compares current (1990) noise measurement estimates with those projected to result from traffic generated at full buildout of the *General Plan Land Use Diagram*. Table VIII-1 indicates the distance in feet from the center line of the roadway segments. Within these contours, noise levels are projected to be 60 dB/L<sub>dn</sub> or above. Figure VIII-2 shows the projected future contours for these roadways.

TABLE VIII-1

**NOISE CONTOUR DATA**  
**Distance (Feet) from Center of Roadway**  
**to  $L_{dn}$  Contours**

Segment No.	Description	Distance to Current 60 dB Contour Line	Distance to Future 60 dB Contour Line
Highway 33:			
1	North of Ward	---	204
2	Ward to Olive	138	107
3	Olive to Salado Creek	138	198
4	Salado Creek to M Street	138	211
5	M Street to Las Palmas	194	271
6	Las Palmas to E Street	140	248
7	E Street to Sperry	140	236
8	Sperry to Expressway	140	345
9	South of Expressway	140	156
First Street:			
10	Walnut to Las Palmas	65	64
11	Las Palmas to Orange	44	43
12	Orange to Sperry	--	27
Las Palmas:			
13	Sperry to Ward	--	98
14	Ward to 9th	14	106
15	9th to Highway 33	75	107
16	Highway 33 to Hartley	126	223
17	Hartley to Sycamore	84	204
18	Sycamore to Expressway	--	204
Ward Avenue:			
19	Highway 33 to Olive	41	130
20	Olive to Salado Creek	75	173
21	Salado Creek to Salado Avenue	41	173
22	Salado Avenue to Sperry	36	185
23	Sperry to Expressway	34	112
24	Expressway to Elfers	22	78
25	Elfers to Canal	--	78
Sperry Avenue:			
26	I-5 to Rogers	56	319
27	Rogers to Salado Creek Road	56	298



TABLE VIII-1 (Continued)

**NOISE CONTOUR DATA**  
**Distance (Feet) from Center of Roadway**  
**to L<sub>dn</sub> Contours**

Segment No.	Description	Distance to Current 60 dB Contour Line	Distance to Future 60 dB Contour Line
Sperry Avenue:			
28	Salado Creek Road to Baldwin	56	236
29	Baldwin to Salado Creek	56	230
30	Salado Creek to Ward	56	211
31	Ward to Clover	56	211
32	Clover to Del Puerto	56	242
33	Del Puerto to Highway 33	48	230
Del Puerto Avenue:			
34	Sperry to Plaza	49	68
Salado Avenue:			
35	Ward to Plaza	30	51
9th Street:			
36	Ward to Sperry	27	87
M Street:			
37	Ward to Highway 33	--	125
I-5:			
38	North of Sperry	1,331	2,539
39	South of Sperry	1,314	1,867
Rogers Road:			
40	Sperry to Canal	--	206
41	North of Canal	--	97
Salado Creek Road:			
42	Sperry to Baldwin	--	63
43	Baldwin to Salado Creek	--	43
44	Salado Creek to Ward	--	68
Baldwin Road:			
45	South of Sperry	--	111
46	North of Sperry	--	89

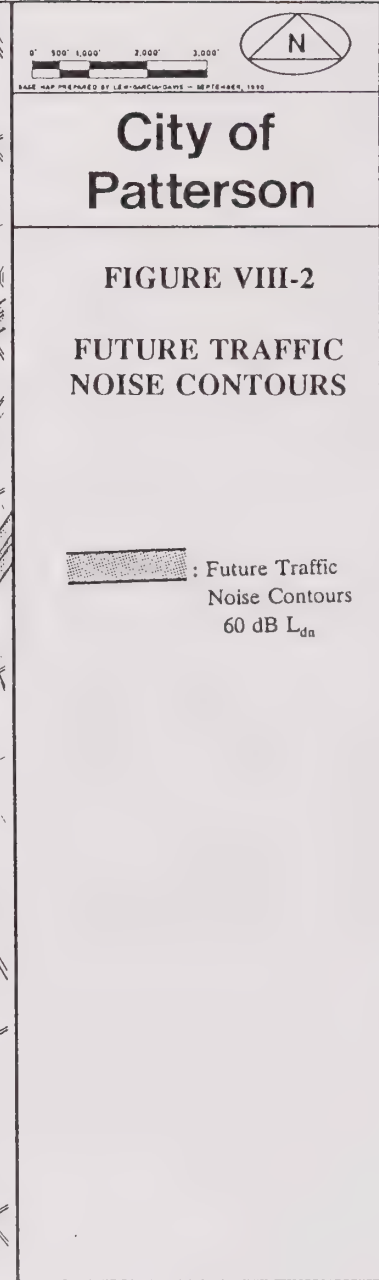
TABLE VIII-1 (Continued)

**NOISE CONTOUR DATA**  
**Distance (Feet) from Center of Roadway**  
**to  $L_{dn}$  Contours**

Segment No.	Description	Distance to Current 60 dB Contour Line	Distance to Future 60 dB Contour Line
Walnut Avenue:			
47	First to Hartley	--	70
48	Hartley to Sycamore	--	51
Orange Avenue:			
49	First to Hartley	--	141
50	Hartley to Sycamore	--	101
Hartley Street:			
51	Walnut to Las Palmas	--	68
52	Las Palmas to Orange	--	73
Sycamore Avenue:			
53	Walnut to Las Palmas	--	56
54	Las Palmas to Orange	--	51
55	Orange to Expressway	--	43
Expressway:			
56	Sperry to Ward	--	266
57	Ward to Highway 33	--	266
58	Highway 33 to Sycamore	--	293
59	Sycamore to Las Palmas	--	284

Source: Brown-Buntin Associates, 1992

Table VIII-2 shows the changes in traffic noise levels resulting from development under the *General Plan*, relative to existing conditions. According to the data in Table VIII-2, traffic noise levels would increase at nine of the ten roadway segments. The increase in traffic noise levels would be noticeable at five of the roadway segments, and would be imperceptible at the other four roadway segments.







**TABLE VIII-2**  
**MAXIMUM CHANGES IN TRAFFIC NOISE LEVELS**  
**Patterson Noise Element**

Roadway	L <sub>dn</sub> (dB) @ 50 feet		Change, dB	Impact*
	Existing	Future		
Highway 33	68.8	70.4	+1.6	0
First Street	61.7	61.6	-0.1	0
Las Palmas Avenue	66.0	69.8	+3.8	1
Ward Avenue	62.7	68.5	+5.8	2
Sperry Avenue	60.7	69.9	+9.2	3
Del Puerto Avenue	59.9	62.0	+2.1	1
Salado Avenue	56.7	60.1	+3.4	1
9th Street	55.9	63.6	+7.7	2
M Street	59.0	65.9	+6.9	2
I-5	81.4	85.6	+4.2	2

\* 0 = Imperceptible change

1 = Barely perceptible change

2 = Noticeable change

3 = Subjective doubling of loudness

Source: Brown-Buntin Associates, 1991

## 2. General Plan Policy Response

The *General Plan* includes the following policies which address noise-sensitive land use.

- VII.E.1. New development of noise-sensitive uses shall not be allowed where the noise level due to non-transportation noise sources will exceed the noise level standards of Table II-3 (from the *Policy Document*), as measured immediately within the property line of the new development, unless effective noise mitigation measures have been incorporated into the development design to achieve the standards specified in Table II-3.
- VII.E.2. Noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table II-3 (from the *Policy Document*) as measured immediately within the property line of lands designated for noise-sensitive uses. This policy does not apply to noise sources associated with agricultural operations on lands zoned for agricultural uses.

TABLE II-3 (FROM *POLICY DOCUMENT*)NOISE LEVEL PERFORMANCE STANDARDS FOR NEW PROJECTS  
AFFECTED BY OR INCLUDING NON-TRANSPORTATION SOURCES

Noise Level Descriptor	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.)
Hourly $L_{eq}$ , dB	50	45
Maximum level, dB	70	65

Each of the noise levels specified above shall be lowered by five dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. These noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).

- VII.E.3. Where proposed non-residential land uses are likely to produce noise levels exceeding the performance standards of Table II-3 (from *Policy Document*) at existing or planned noise-sensitive uses, an acoustical analysis shall be required as part of the environmental review process so that noise mitigation may be included in the project design. (Requirements for the content of an acoustical analysis are identified in Table II-4 (from *Policy Document*).) (Note: For the purposes of these noise policies, transportation noise sources are defined as traffic on public roadways, railroad line operations and aircraft in flight. Control of noise from these sources is preempted by Federal and State regulations. Other noise sources are presumed to be subject to local regulations, such as a noise control ordinance.)



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**TABLE II-4 (FROM *POLICY DOCUMENT*)****REQUIREMENTS FOR AN ACOUSTICAL ANALYSIS**

An acoustical analysis prepared pursuant to the noise policies of the *General Plan* shall:

- A. Be the responsibility of the applicant.
- B. Be prepared by a qualified person experienced in the fields of environmental noise assessment and architectural acoustics.
- C. Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and the predominant noise sources.
- D. Estimate existing and projected (20 years) noise levels in terms of  $L_{dn}$  or CNEL and/or the standards of Table II-3, and compare those levels to the adopted policies of the Noise Element.
- E. Recommend appropriate mitigation to achieve compliance with the adopted policies and standards of the noise section of the *General Plan*. Where the noise source in question consists of intermittent single events, the report must address the effects of maximum noise levels in sleeping rooms in terms of possible sleep disturbance.
- F. Estimate noise exposure after the prescribed mitigation measures have been implemented.
- G. Describe a post-project assessment program which could be used to evaluate the effectiveness of the proposed mitigation measures.

- 
- VII.E.4. The feasibility of proposed projects with respect to existing and future transportation noise levels shall be evaluated by comparison to Figure II-1 (of *Policy Document*).
  - VII.E.5. New development of noise-sensitive land uses will not be permitted in areas exposed to existing or projected levels of noise from transportation noise sources which exceed the levels specified in Table II-5 (of *Policy Document*), unless the project design includes effective mitigation measures to reduce noise in outdoor activity areas and interior spaces to the levels specified in Table II-5.
  - VII.E.6. Noise created by new transportation noise sources, including roadway improvement projects, shall be mitigated so as not to exceed the levels specified in Table II-5 (of *Policy Document*) at outdoor activity areas or interior spaces of existing noise-sensitive land uses in either the incorporated or unincorporated areas.

- VII.E.7. Where noise-sensitive land uses are proposed in areas exposed to existing or projected exterior noise levels exceeding the levels specified in Table II-5 (of *Policy Document*) or the performance standards of Table II-3 (of *Policy Document*), an acoustical analysis shall be required as part of the environmental review process so that noise mitigation may be included in the project design.
- VII.E.8. Where noise mitigation measures are required to achieve the standards of Tables II-3 and II-5 (of *Policy Document*), the emphasis of such measures shall be placed upon site planning and project design. The use of noise barriers shall only be considered a supplemental means of achieving the noise standards after all practical design-related noise mitigation measures have been integrated into the project.

TABLE II-5 (FROM *POLICY DOCUMENT*)

MAXIMUM ALLOWABLE NOISE EXPOSURE  
TRANSPORTATION NOISE SOURCES

Land Use	Outdoor Activity Areas <sup>1</sup>	Interior Spaces	
	$L_{dn}/CNEL, Db$	$L_{dn}/CNEL, db$	$L_{eq}, Db^2$
Residential	60 <sup>3</sup>	45	--
Transient Lodging	60 <sup>3</sup>	45	--
Hospitals, Nursing Homes	60 <sup>3</sup>	45	--
Theaters, Auditoriums, Music Halls	--	--	35
Churches, Meeting Halls	60 <sup>3</sup>	--	40
Office Buildings	60 <sup>3</sup>	--	45
Schools, Libraries, Museums	--	--	45
Playgrounds, Neighborhood Parks	70	--	--

<sup>1</sup> Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use.

<sup>2</sup> As determined for a typical worst-case hour during periods of use.

<sup>3</sup> Where it is not possible to reduce noise in outdoor activity areas to 60 Db  $L_{dn}/CNEL$  or less using a practical application of the best available noise reduction measures, an exterior noise level of up to 65 Db  $L_{dn}/CNEL$  may be allowed, provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

### 3. Impacts

The *General Plan* includes policies, standards, and programs to avoid noise-related impacts from existing uses and new development. The impact of the *General Plan* on noise conditions would, therefore, be less than significant.

#### **4. Mitigation Measures**

None required.





## CHAPTER IX

### MANDATORY CEQA SECTIONS

#### A. INTRODUCTION

The California Environmental Quality Act and the *State CEQA Guidelines* require that environmental impact reports include discussion of the following issues:

- Alternatives to the proposed action (*CEQA Guidelines* §15126 (d))
- The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity (*CEQA Guidelines* §15126 (e))
- Any significant irreversible environmental changes which would be involved in the proposed action should it be implemented (*CEQA Guidelines* §15126 (f))
- Growth inducing impact of the proposed action (*CEQA Guidelines* §15126 (g))
- Cumulative impacts (*CEQA Guidelines* §15130)

#### B. ALTERNATIVES

##### Existing General Plan (No Project Alternative)

State law requires that each city and county adopt a general plan. Thus, if the City of Patterson does not adopt a revised general plan, it would continue to rely on the 1978 *General Plan* as its development guide.

The 1978 *General Plan Land Use Diagram* is shown in Chapter I of the *General Plan Background Report*. The 1978 *General Plan* designates land within the existing city limits and beyond. Land designated for urban development in the 1978 *General Plan* beyond the existing city limits includes the northwest territories on the northwest, north to Walnut Avenue to the northeast, east to Lateral J Canal, south to the Patterson Water District main canal on the east side of Highway 33, and to Ward Avenue on the west.

Development of vacant land within the current city limits would be essentially the same as would be permitted under the *General Plan*. Vacant and underutilized land within the 1978 *General Plan* includes 4 acres of commercially-designated land, 122 acres of industrially-designated land, and 594 gross acres of residentially-designated land. At buildout, using the same assumptions included in the *General Plan*, this would provide for 43,560 square feet of new commercial development, 1.2 million square feet of new industrial development, and 2,100 new dwelling units, or roughly 6,000 additional residents.

Continued reliance on the 1978 *General Plan* would provide for less population growth than would be allowed under the *General Plan*. The 1978 *General Plan* also provides for less industrial development and virtually no new commercial development. Buildout of the 1978 *General Plan* would require less water and sewer capacity and would have fewer impacts on police, fire, and school services. The City's ability to finance these services, however, and finance major new roadway and drainage improvements would be impacted because it would not have the tax base which accompanies commercial and industrial development. The land designated west of the existing limits would be developed with residential uses, making expansion of Patterson's central business district impossible. The 1978 *General Plan* does not contain park standards, which would make the provision of parks more difficult.

Development under the *1978 General Plan* would result in the conversion of less prime farmland than the General Plan and would have less impact on regional air quality. In both of these areas, however, the *1978 General Plan* would still result in a significant adverse impact which could not be mitigated.

## **Issues and Options Report**

As part of the General Plan preparation process, the City of Patterson prepared and considered a General Plan *Issues and Options Report*. This report identified what the consultants believed to be the most critical issues to be addressed in the new general plan. These included such issues as the amount and mix of new development, the rate of development, circulation, residential, commercial and industrial development, agricultural lands, parks and recreation, historic preservation, and several others. For each of 22 issues, the report identified two or more options. The *Issues and Options Report* evaluated each of these options in qualitative terms.

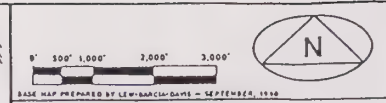
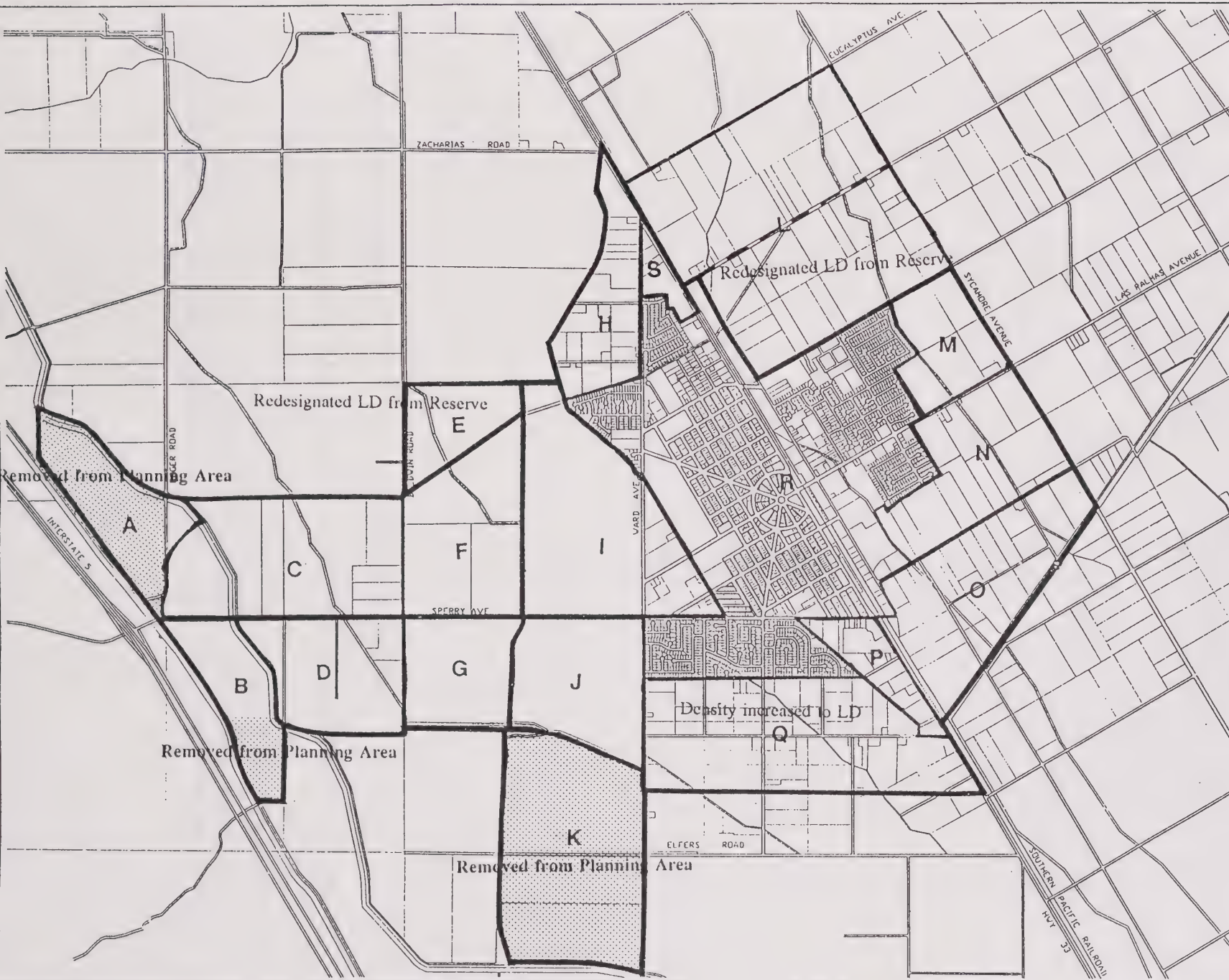
Based on public comment, the recommendations of the Planning Commission, and the City Council's own review, the City Council selected one or more preferred options for each issue. These preferences were used as the basis for preparing the *General Plan*.

As a practical matter, because of the comprehensive nature of the general plan, there are an infinite number of possible alternatives to the *General Plan* as proposed. For most policies in the plan, there is at least one alternative, and for many, if not most, individual parcels of land, there is at least one feasible alternative land use designation. The evaluation of the impacts of all these alternatives and their many combinations is simply not feasible.

## **Draft General Plan**

The *Draft General Plan*, which was circulated for public review from February through November 1991, included a somewhat different land use configuration from the *Final General Plan*. Impacts of the *Draft General Plan* are described in the *Draft General Plan* and *Draft EIR*. Specifically, changes in the *Final General Plan* include deletion of all land designated for Business Park Reserve, redesignation of some areas designated as Residential Reserve to Low Density Residential, and removal of the area east of Salado Creek extending south to the Delta-Mendota Canal. Table IX-1 indicates changes in the buildout calculations. Figure IX-1 shows the *Draft General Plan* boundaries and the areas included in the *Draft General Plan Land Use Diagram* which are not included in the *Final Plan*.





# City of Patterson

FIGURE IX-1  
DRAFT GENERAL PLAN  
AREA



TABLE IX-1

**CHANGES BETWEEN THE DRAFT AND FINAL GENERAL PLAN  
By Subarea**

	Draft GP		Final GP		Net Change	
	NR	R	NR	R	NR	R
Acres						
Subarea						
A	--	123	<i>Removed</i>		--	-123
B	--	95	60	--	+60	-95
C	232	--	251	--	+19	--
D	164	--	164	--	--	--
E	--	89	89	--	+89	-89
F	238	--	218	--	-20	--
G	125	--	125	--	--	--
H	132	--	132	--	--	--
I	324	--	314	--	-10	--
J	181	--	181	--	--	--
K	348	--	<i>Removed</i>		-348	--
L	--	570	308	310	+308	-260
M	116	--	116	--	--	--
N	203	--	202	--	-1	--
O	225	--	233	--	+8	--
P	36	--	36	--	--	--
Q	111	--	357	--	+246	--
R	26	--	41	--	+15	--
S	23	--	23	--	--	--
Total Acres	2,484	877	2,850	310	+426	-567
New Housing Units	6,354		7,789		+1,435	
New Population	17,538		21,623		+4,085	

NR = Non-reserve designations

R = Reserve designations

Note: Some acreage changes result from corrections to the buildout calculations rather than land use changes

As Table IX-1 indicates, the *Draft General Plan* would accommodate approximately 4,000 fewer people than the *Final General Plan* in the non-reserve designations. *General Plan* policy, however, still limits



population over the 20-year time frame of the *General Plan* to specified maximums. While the *Draft General Plan* included less acreage in non-reserve designations, changes made to the *Final General Plan* include an increase of density through redesignation of the area designated for Estate Residential (maximum density of 1 unit per 10 acres) to Low Density Residential (maximum density of 5 units per acre), which provides for a more efficient use of land. In addition, the area immediately west of Salado Creek extending south to the Delta-Mendota Canal was eliminated from the *Land Use Diagram* in the *Final General Plan*; this area had raised concerns over the impacts on surrounding farmland. The area northeast of the city currently within the sphere of influence was redesignated from Residential Reserve to Low Density Residential.

Two important changes in the *Circulation Plan Diagram* were also made in the *Final General Plan*. The southern bypass expressway alignment was located farther to the south, along the southern boundary of the Planning Area. An additional roadway connection of Sperry Avenue across Highway 33 to Orange Avenue was added. The Sperry/Orange Avenue connection results in increased traffic along Sperry Avenue, this is, however, a less expensive short-term alternative to facilitate east-west travel.

### **Other Alternatives**

On a more general level, an alternative to the *General Plan* is the designation of more or less land for urban development. On this basis, alternatives were identified for analysis which reflect most or all of the City Council's direction based on the *Issues and Options Report* and generally reflected land use boundaries that were brought up during public hearings or discussion.

#### Compact Core Area

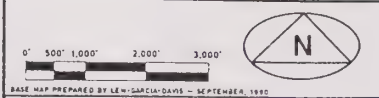
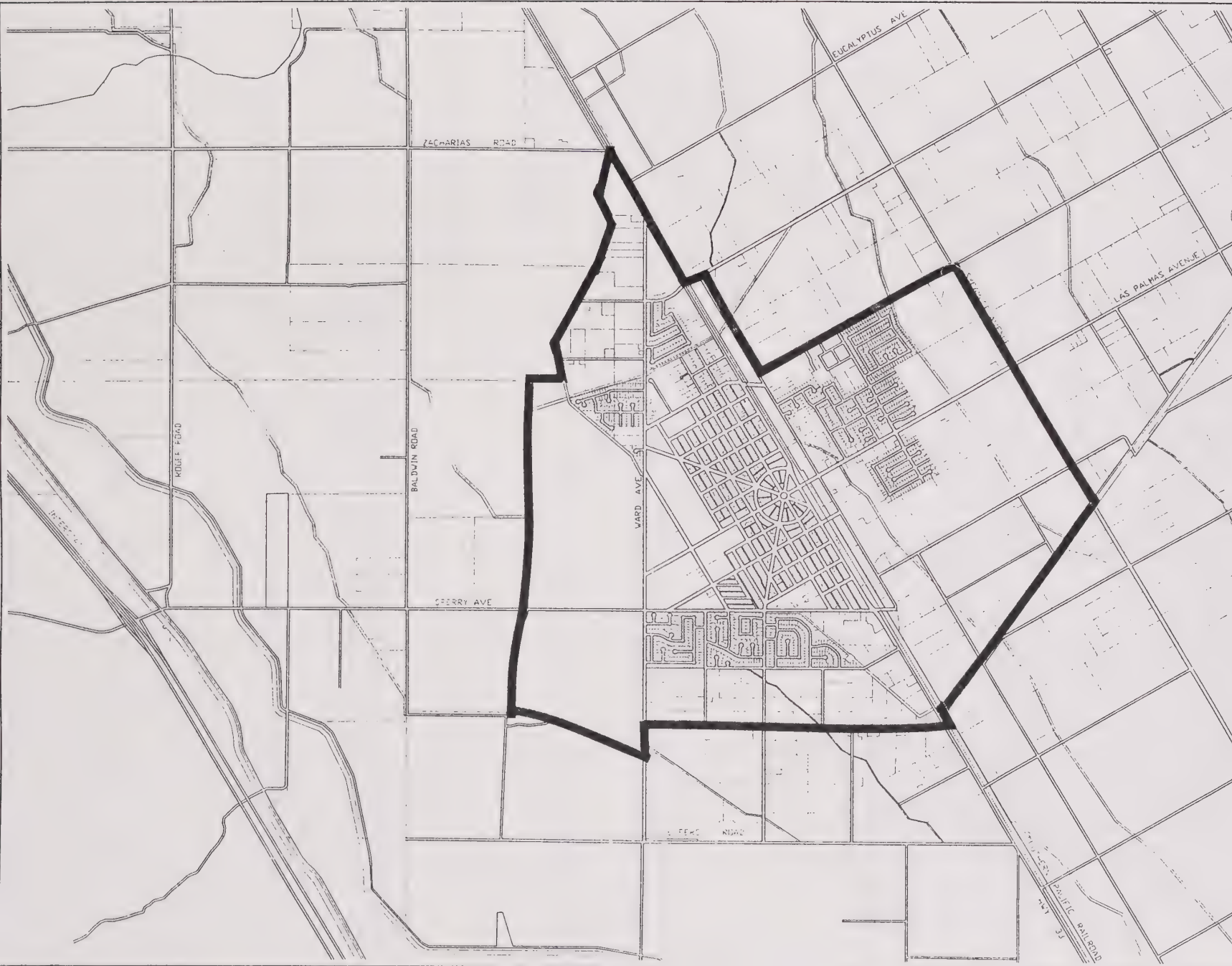
The compact core area alternative includes the boundaries shown in Figure IX-2, with the same land use designations as the *General Plan*. This alternative provides for an increase in population of about 10,600 persons, provides for the same amount of commercial development as the *General Plan Land Use Diagram*, and approximately 2.8 million square feet of new industrial development.

This alternative provides for denser overall development than the 1978 *General Plan* and provides for the extension of the central business district. It would not meet the City Council's and citizen's goals of 21,000 population (though Measure J) by 2011 or the stated goal of location of industrial land with good access to I-5. In addition, it probably contains more commercially-designated land than could be accommodated by its 2011 population.

Because it contains less land and a lower population holding capacity, development under the compact core area alternative would have resulting fewer impacts on agricultural land and public facilities and services. It is not likely, however, that it would meet the City's goals for population and better fiscal balance.

#### 21,000 Population

Another alternative suggested was to include only enough land to accommodate the 21,000 population limit established as City policy in the *Policy Document* (and though Measure J). While this could include a wide range of possible land use configurations, assuming relatively compact development would result in an area which includes the compact core alternative and the half of subarea 1 included in the *Plan* and



# City of Patterson

FIGURE IX-2  
COMPACT CORE AREA  
ALTERNATIVE





within the current sphere of influence. The impacts would thus be similar to those discussed under the compact core area alternative.

While the holding capacity of the 21,000 population alternative would be lower, given the policy constraints within the *General Plan Policy Document*, however, the impacts of the *General Plan* over the next 20 years would be very similar. The *General Plan*, however, provides for development over a longer time frame and greater flexibility and responsiveness to market demands concerning the location of new development. Limiting the Planning Area to a holding capacity of 21,000 could result in the city having little flexibility in determining the timing and location of new development, and could result in a lower levels of both residential and non-residential development.

### C. SHORT-TERM VERSUS LONG-TERM USES

A general plan must by law be comprehensive and long-term. As a practical matter, an EIR on a comprehensive general plan is an assessment of the long-term cumulative impacts of development. The plan provides a framework for making trade-offs among competing values and interests. It also sets out policies and programs to address the potentially adverse effects of new development.

As noted earlier in this *EIR*, traffic congestion along some roadway alignments, agricultural land conversion, and regional air quality are areas in which the plan does not fully mitigate identified impacts. The conversion of agricultural land is a long term commitment, while traffic congestion and regional air quality problems can ultimately be solved.

### D. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The *General Plan* would commit most of the land area of the Planning Area to urban uses. This is a permanent change, but is not considered in itself an adverse impact. The conversion of agricultural land to urban use is, however, considered a significant, permanent adverse impact, which cannot be mitigated except by designating the land for agricultural uses.

Except for the conversion of agricultural land, none of the secondary impacts of increased urbanization is considered irreversible.

### E. GROWTH-INDUCING IMPACTS

A general plan which proposes future development is by definition "growth-inducing." The plan, however, attempts to address all the potentially adverse implications of this growth through policies, programs, and proposals for adequate infrastructure, promotion of a reasonable balance between jobs and housing, and protection of environmentally-sensitive resources.

In particular, the alignment of the southern bypass expressway could have a growth-inducing impact on lands south of the Planning Area.

## F. CUMULATIVE IMPACTS

As a practical matter, an EIR on a comprehensive general plan is an assessment of the cumulative impacts of development within the Planning Area of the plan. The plan provides a framework for making tradeoffs among competing values and interests. It also sets out policies and programs to address the potentially adverse cumulative effects of new development.

Development under the *General Plan* will add cumulatively to impacts from development throughout the region. Specifically, the I-5 corridor between I-5/580 and Highway 152, generally the western San Joaquin Valley from Tracy to Los Banos, has been the focus of significant development interest since 1988. Several "new towns" have been proposed, four in Stanislaus County, and two in San Joaquin County. In addition, major developments for existing West Side cities and unincorporated communities have been proposed. The *Background Report* summarizes the major development projects proposed in the region. In western Stanislaus County, proposals include growth allowed under the City of Newman's proposed *General Plan* (still in draft form as of February 1992), Lakeborough, Diablo Grande, Mapes Ranch, and growth in the unincorporated community of Grayson.

The cumulative effects of growth would be most demonstrably reflected in increased traffic and the resulting impacts on the regional roadway and highway system, primarily on I-5.

Other cumulative effects from development in the region include loss of agricultural lands and effects on regional air quality. Development under Patterson's *General Plan* would contribute to the cumulative loss or degradation of these resources.

## APPENDIX A

### CEQA COMPLIANCE

This appendix describes where each of the issues required to be included in an EIR is addressed in the various General Plan documents. The following abbreviations are used in the table below:

GPBR	<i>General Plan Background Report</i>
GPIOR	<i>General Plan Issues and Options Report</i>
GPPD	<i>General Plan Policy Document</i>
DEIR	<i>Draft EIR</i>
FEIR	<i>Final EIR</i>

CEQA GUIDELINES REQUIREMENTS	DOCUMENT	CHAPTER/SECTION
Table of Contents (§15122)	FEIR	
Summary (§15123)	FEIR	Chapter I
Project Description (§15124)	FEIR	Chapter I
	GPPD	Entire Document
	GPBR	Chapter I
Environmental Setting (§15125)	GPBR	Entire Document
Significant Environmental Effects (§15126 (a))	FEIR	Chapters III-VIII
Significant Unavoidable Effects (§15126 (b))	FEIR	Chapters III-VIII
Mitigation Measures (§15126 (c))	DEIR, FEIR	Chapters III-VIII
Alternatives (§15126 (d))	DEIR, FEIR	Chapter IX
	GPIOR	Entire Document
Long-term Versus Short- Term (§15126 (e))	FEIR	Chapter IX
Significant Irreversible Changes (§15126 (f))	FEIR	Chapter IX
Growth-Inducing Impacts (§15126 (g))	FEIR	Chapter IX
Effects Not Found to be Significant (§15128)	FEIR	Chapter III-VIII
Organizations and Person Consulted (§15129)	GPBR	Chapters I-X
Cumulative Impacts (§15130)	FEIR	Chapter IX
Economic and Social Effects (§15131)	FEIR	Chapter V





**APPENDIX B**  
**REPORT PREPARATION**

**J. Laurence Mintier & Associates**

J. Laurence Mintier	Project Management
Lucinda Willcox Gaab	EIR Coordination, Land Use, Housing, Population Transportation (excluding streets and roads); Public Facilities and Services (excluding water, sewer, and drainage); Recreation and Cultural Resources, Health and Safety
Scott Olson	Graphics

**Joseph R. Holland, Consulting Traffic Engineer**

Joe Holland	Transportation, Streets and Roads
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**Jones & Stokes Associates**

Debbie Loh	Project Management, Natural Resources
Steve Whiting	Coordination, Natural Resources

**Brown-Buntin Associates**

Jim Buntin	Project Management, Noise
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**Santina & Thompson**

Brian Lee	Project Manager, Drainage and Flooding
Larry Wilson	Senior Engineer, Drainage and Flooding

**Bookman-Edmonston Engineering**

Herbert Greydanus	Project Management, Water Supply
Daniel Steiner	Project Coordination, Water Supply
Mark Salmon	Water Supply

**Dewante and Stowell**

Charles Bunker	Project Management, Wastewater
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## APPENDIX C

### ASSUMPTIONS FOR BUILDOUT CALCULATIONS

#### A. Between Canals, North of Sperry

- Deleted

#### B. Between Canals, South of Sperry

- 60 gross acres
- Entire area designated Highway Service Commercial
- Currently agriculture and vacant land
- Assumes buildout of all 60 acres within the time frame of the General Plan

#### C. East of Baldwin Road, North of Sperry

- 281 gross acres
- 49-acre area east of canal is designated as Highway Service Commercial; assumes buildout within the time frame of the *General Plan*
- 30-acre Patterson Airport is designated Public/Quasi-Public; assumed that it will retain use as airport through the time frame of the *General Plan*
- Remaining 202 acres west of canal is designated Light Industrial, assumes 15 percent reduction in gross developable acreage to account for streets and roads.

#### D. East of Baldwin Road, North of Sperry

- 172 gross acres
- Entire area designated Light Industrial
- 8-acre site used by California Department of Forestry station will remain through the time frame of the *General Plan*
- Assumes buildout of remaining 164 acres within the time frame of the *General Plan*
- Assumes 15 percent reduction in gross developable acreage to account for streets and roads.

#### E. East of Baldwin, North End of Planning Area

- 89 gross acres
- Entire area designated Low Density Residential
- Currently agriculture and vacant land

#### F. East of Baldwin, West of Salado Creek, North of Sperry

- 218 gross acres
- Entire area designated Low Density Residential
- 20-acre community park assumed to be developed within this subarea; precise location to be determined based on further study

**G. East of Baldwin, West of Salado Creek, South of Sperry**

- 125 gross acres
- Entire area designated Low Density Residential

**H. Northwest Territories**

- 136 gross acres
- Entire area is designated Low Density Residential
- Assume 4 acres currently developed with 6 dwelling units will remain; assumes buildout of remaining 132 acres within the time frame of the *General Plan*

**I. Western Expansion of Downtown**

- 324 gross acres
- 63 acres designated Low Density Residential
- 75 acres designated Downtown Residential
- 43 acres designated Medium Density Residential
- 30 acres designated High Density Residential
- 58 acres designated Downtown Core
- 17 acres designated Medical Professional Office; assumed 12-acre hospital site and 5 acres of medical-professional offices
- 38 acres designated Public/Quasi-Public; includes 20-acre junior high school site and 18-acre site to include civic/community/senior center, new fire and police stations, and public plaza
- 2 acres currently developed with 26 dwelling units are assumed to be recycled to other uses within the time frame of the *General Plan*

**J. East of Salado Creek, West of Ward Avenue, South of Sperry, North of Canal**

- 181 gross acres
- Entire area designated Low Density Residential

**K. East of Salado Creek, West of Ward Avenue, South of Canal**

- Deleted

**L. North of Walnut, East of Highway 33**

- 618 gross acres
- 308 acres designated Low Density Residential; assumes buildout within the time frame of the *General Plan*
- 310 acres designated Residential Reserve; assumes no buildout within the time frame of the *General Plan*; planned for development with residential uses beyond the time frame of the *General Plan*

**M. South of Walnut, North of Las Palmas, East of Current City Limits**

- 116 gross acres
- 111 acres designated Low Density Residential
- 5 acres designated Neighborhood Commercial

**N. South of Las Palmas, North of Orange, East of Current City Limits**

- 203 gross acres
- 197 acres designated Low Density Residential
- 5 acres designated Neighborhood Commercial
- Currently 1 acre developed with 2 dwelling units; assumed these uses will remain

**O. South of Orange, East of Highway 33**

- 233 gross acres
- 142 acres designated Light Industrial
- 91 acres designated Heavy Industrial
- Assumes 15 percent reduction in gross developable acreage to account for streets and roads
- 30 dwelling units assumed to be converted to nonresidential uses within the time frame of the *General Plan*

**P. Western Side of Highway 33, South of Sperry**

- 55 gross acres
- Entire area designated General Commercial
- 17 acres currently developed with industrial uses; assumed these shall remain within the time frame of the *General Plan*
- 6 acres currently developed with commercial uses; assumed these shall remain within the time frame of the *General Plan*
- 5 acres currently developed with 10 dwelling units; assumed these shall remain within the time frame of the *General Plan*
- 3 acres developed with 2 dwelling units; assumed these shall recycle to other uses within the time frame of the *General Plan*

**Q. South of Poppy**

- 365 gross acres
- Entire area designated Low Density Residential
- 8 acres developed with 13 dwelling units; assumed to remain within time frame of the *General Plan*
- Assumes buildout of the remaining 357 acres within the time frame of the *General Plan*

**R. Developed Portion of City**

- 678 net acres
- Existing land uses assumed to remain with their existing uses include:

445 residential acres with 2,773 dwelling units



22 acres of commercial uses

70 acres of industrial uses

105 acres of public/quasi-public uses, including: 3 detention ponds; 2 acres parkland; 9 churches; city corporation yard, city hall, city-owned parking lot, post office, courts, library, police/fire department, 2 elementary schools, 1 junior high school, and 1 high school, 1 private school, hospital, county/utility offices, meeting halls, and city well sites.

- Vacant land use assumed for development within the time frame of the *General Plan* includes:

25 acres Low Density Residential (includes land with approved subdivision maps)

2 acres Downtown Residential

2 acres High Density Residential

4 acres General Commercial

2 acres Downtown Core

1 acre Medical/Professional Office

#### **S. Northern Intersection of Ward and Highway 33**

- 24 acres
- 2 acres currently developed with commercial uses
- Vacant land:
  - 13 acres designated Low Density Residential
  - 8 acres designated High Density Residential
  - 1 acre designated General Commercial

# APPENDIX D

## PATTERSON GENERAL PLAN BUILDOUT BY LAND USE DESIGNATION New Development Only

	RESIDENTIAL					COMMERCIAL/OFFICE						INDUSTRIAL			OTHER			RESERVE			GRAND TOTAL
	LR	DR	MR	HR	Total	NC	GC	DC	HSC	MP	Total	LI	HI	Total	PQP	PR	Total	RR	BPR	Total	
Avg. density/FAR	4.0	7.0	10.0	16.0		0.25	0.30	0.25	0.25	0.25		0.30	0.25								
Subarea (acres)																					
B									60		60										60
C									49	17	66	185		185							251
D												164		164							164
E	89				89																89
F	218				218																218
G	125				125																125
H	132				132																132
I	63	55	68	21	207			61		8	69				38		38				314
J	181				181																181
L	308				308													310		310	618
M	111				111	5					5										116
N	197				197	5					5										202
O												142	91	233							233
P							36				36										36
Q	357				357																357
R	25	2		2	29		4	2		1	7		5	5							41
S	13			8	21		2				2										23
Total Acres	1,819	57	68	31	1,975	10	42	63	109	26	250	491	96	587	38		38	310		310	3,160
Less deduction*	1,601	50	60	27	1,738							417	82	499				279		279	
Total DUs	6,403	351	598	436	7,789																
Less 5% vacancy	6,083	334	568	415	7,399																
Assumed PPH	3.00	2.75	2.50	2.50																	
New population	18,248	917	1,421	1,037	21,623																
SF (in thous.)						109	549	686	1,187	54	2,585	6,416	1,045	7,462							10,047

\* 12% reduction assumed for all residential designations to account for parks, schools, detention basins, and institutional uses;  
15% reduction applied to large tracts of industrial land to account for streets and roads





## APPENDIX E

### AIR QUALITY MODELING ASSUMPTIONS\*

Land Use	Trip Rate	Size	Total Trips
Composite Residential	10.0/unit	6,083	60,830
Neighborhood Commercial	117.0/1,000 sq. ft.	109	12,753
Downtown Core	71.0/1,000 sq. ft.	686	48,706
Highway Service Commercial	350.0/1,000 sq. ft.	1187	415,450
General Commercial	21.3/1,000 sq. ft.	549	11,694
Medical/Prof. Office Park	20.7/1,000 sq. ft.	54	1,118
Light Industrial	5.5/1,000 sq. ft.	6,416	35,288
Heavy Industrial	1.5/1,000 sq. ft.	1,045	1,568

	Home/Work	Residential		Commercial	
		Home/Shop	Home/Other	Work	Non-
Work					
Trip Length	10.0**	3.5	2.5	4.2	3.6
% Started Cold	88.6	40.4	58.8	77.8	27.6
Trip Speed	45	30	35	35	35
% Trip	27.3	21.2	51.5		

### VEHICLE FLEET MIX

Vehicle Type	Percent Type	Leaded	Unleaded	
Diesel				
Light Duty Autos	72.8	0.0	97.5	2.5
Light Duty Trucks	14.3	0.0	97.4	2.6
Medium Duty Trucks	4.3	0.0	100.0	0.0
Heavy Duty Trucks	3.9	11.4	88.6	N/A
Motorcycles	0.9	100.0	N/A	N/A

\* All assumptions are based on a single day of operation

\*\* 5.0 substituted for the five-mile average trip length scenario



## APPENDIX F

### DRAFT EIR COMMENTS

The following list identifies the written comments received on the *Draft General Plan EIR*. The comments are included in this appendix. Each comment is then summarized and a response given in Appendix G.

Date	Agency/Individual
5/10/91	Kenneth Tyler, 1537 Orange Avenue, Patterson
5/11/91	Claude Delphia, 425 H Street, Patterson
5/24/91	Department of Fish and Game, Region 4 (George D. Nokes) 1234 Shaw Avenue, Fresno 93710
6/3/91	Kenni G. Friedman, Stanislaus County LAFCO Commissioner 508 Andover Lane, Modesto 95350
6/13/91	Fran Sutton-Berardi, Senior Planner to LAFCO 1100 H Street, Modesto 95354
6/13/91	Department of the Navy, NALF Crows Landing, 95313
6/19/91	Stanislaus Area Association of Governments (Dennis Brighton) 1315 I Street, Modesto 96354-0913
6/18/91	Public Utilities Commission, Railroad Safety Branch (Tack S. Joe) 505 Van Ness Avenue, San Francisco, 94102-3298
6/24/91	Claude Delphia (second comment), 425 H Street, Patterson
6/24/91	Stanislaus County Department of Environmental Resources Air Pollution Control District (David Jones) 1716 Morgan Road, Modesto 95351
6/24/91	Compliance acknowledgement from OPR
6/19/91	Department of Transportation (Al Johnson, IGR Coordinator) P.O. Box 2048, Stockton 95201
5/22/91	Department of Water Resources (Everett Astleford)
6/25/91	Department of Food and Agriculture (Mary McNally, Graduate Student Assistant) 1220 N Street, Sacramento 95814-0001
7/5/91	Stanislaus County Department of Agriculture (Keith Mahan) Department of Weights and Measures 725 County Center III Court, Modesto 95355
7/9/91	Patterson Planning Commission comments



F A X C O V E R L E T T E R

Kenneth Tyler  
Tyler's Welding Shop  
P.O. Box 186  
22113 Highway 33  
Crows Landing, CA 95310  
TEL (209)837-4236  
FAX (209)837-4236

DATE: 01/23/10  
TIME: 01:46

3 Pages Follow

TO:

COMPANY:

FROM: Kenneth Tyler

COMPANY: Tyler's Welding Shop

C O M M E N T S

Please enter this in the official records as a comment on the Draft  
EIR for the General Plan. Thank You.

1d 1/2 \* , , ,  
ng Commission,



To the Patterson City Council and Planni

An EIR is supposed to fully describe AND QUANTIFY, both the impacts and the proposed mitigations of such impacts for this general plan so that BOTH the public and the governing bodies have adequate information before them to make decisions. The cumulative effect of these impacts when considered along with other plans proposed in the area must also be described AND QUANTIFIED. Traffic, water, Ag land conversion, and air pollution are all areas that require such regional cumulative impact studies within the EIR for the new general plan.

This has not been done in the Draft EIR. Therefore this DEIR cannot serve as a legally adequate planning document.

This plan by its own admission has unmitigateable impacts on the conversion of Agricultural lands and air quality. Nevertheless the DEIR contains no substantial efforts to mitigate either impact.

This plan assumes that the City of Patterson has a right to do whatever is necessary to secure future tax revenues. This leads to two policies. 1) The City should grow out to I-5. 2) The City should allow lots of residential growth in order to attract jobs.

1) A DEIR is mandated to consider reasonable alternatives. Stanislaus County is perfectly capable of handling whatever development is proper for the Sperry Ave. I-5 interchange. This could be done without the enormous conversion of Agricultural Land and the huge impact on air quality involved in having the City of Patterson grow to the freeway. This has not been considered as an alternative in this DEIR.

The new cities proposed in the foothills could handle the residential housing this plan proposes without having to build it on Prime Agricultural Land. This plan does not consider that as an alternative.

This plan is so large it contains ITS OWN residential reserve. The most logical alternative--adding only enough land to the current sphere of influence to move to the desired 21,000 population level--is not examined at all in this DEIR. Policies are mandated to choose the alternative that minimizes the impacts, but aside from "no project" this plan only presents alternatives that are, by its own admission, larger, and therefore more damaging, than what would be reasonable required.

2) Present air quality regulations are making residential housing, with its attendant automotive pollution a factor that prohibits future industrial development for the area. This is not discussed in the DEIR.

The impact of the proposed growth on the existing city of Patterson--at least a doubling in size--is not discussed in this DEIR. During the planning process the City has admitted quite freely that it suffers from serious infrastructure deficiencies. It has not established that it will indeed be able to both cure these problems and solve all the new problems associated with new growth.

The City's own financial expert stated that all the new infrastructure made necessary by this growth cannot be paid for solely by monies derived from the new growth. Therefore there will be an infrastructure deficiency caused by the new growth that will be added to the existing deficiency. The City has put forward no mechanism to make up these deficiencies. If the City cannot cure its present problems and if new growth will not generate enough financing to fully pay for its impacts, then the City cannot serve the new growth unless it reduces its levels of service to both the existing City and the new growth to a much lower level. This whole issue receives only superficial treatment in the Gruen and Gruen report and is not dealt with in the DEIR or general plan.

Given the current fiscal condition of the City and the general economic climate of State government, I believe an argument could be put forward that the City will not be able to adequately serve the new growth proposed.

The whole issue of Water is addressed in the DEIR only in passing. It is stated that after reaching 15,000 people the City will HAVE TO find a source of surface water, but no actual description of how or if this will be possible is included.

One can only conclude that instead of serving its intended purpose as a fact finding document upon which decision can be based this DEIR was written as a cover f

or decisions that had already been made, i.e., massive growth on the agricultural lands to the west of Patterson.

The DEIR is therefore not a legally adequate document and, unless corrected in the final EIR, should be judged so by all agencies concerned. LAFCO in particular should act to make itself the lead agency in regard to this EIR if the current flaws are not corrected and insist that it be done properly so that when the general plan arrives before LAFCO we will not hear the familiar argument repeated about how the City is the lead agency and therefore its judgement cannot be questioned.

Thank You,

Kenneth Tyler, 1537 Orange Ave. Patterson, CA 95363 892-8317 or 837-4236

t after reaching 15,000 people the City will HAVE TO find a source of surface water, but no actual deq ← 1 w 2



May 11, 1991

Please include the following as part of the written comments on the Draft EIR.

## TRAFFIC

*Traffic standards missing - Since these were missing at the time the public hearing phase of the Draft EIR process was conducted, was the Draft EIR public hearing phase conducted properly? (I phoned City Manager John Nachbar in early April and informed him that a portion of the Draft General Plan appeared to be missing.)*

The following are comments about Draft EIR Map Page IV-4, Map 2

### East Las Palmas

Impact of 4 lanes on East Las Palmas.

What is the impact on existing residents whose houses face on or back up to East Las Palmas. This is not addressed in EIR.

No bus turn lane - The school district has stated that it is not possible to have a school bus enter the Las Palmas Estates subdivision and turn around. Therefore the bus must stop on East Las Palmas at Hartley. This would cause a serious safety issue if East Las Palmas were to be designated as four lanes. This impact is not addressed in the Draft EIR.

Impacts on Historic Palm trees - The residents of Patterson have been assured, time after time, by Mayor Bingham and the City Council that Patterson's character will not be lost. Certainly its historic character will be negatively impacted if East Las Palmas is turned into four lanes and the Historic Palm Trees will be diminished.

This example shows a failure of Mintier and Assoc. to appreciate what Pattersonites value in character.

The Draft EIR does not address this impact.

Impacts on safety at Patterson Frozen Foods

Businesses between 1st and Weber - What is the impact of four lanes on the businesses located from 1st to Weber Avenue?

Bike Lanes - What is the impact of four lanes on East Las Palmas bike lanes?  
This impact is not addressed.

### Sperry Avenue, east of Ward

Designation as four lanes - Figure IV-2.

Sperry Avenue probably has a right of way of less than 75. This is inadequate for four lanes and if four lanes is planned, would require taking property from present residents, etc.

The impact on residences which face or back up to this street should be addressed.

Bike Lanes - What is the impact of four lanes on East Sperry Avenue bike lanes? This impact is not addressed.

Businesses on Sperry Avenue - What is the impact of four lanes on the businesses located between Del Puerto Ave. and Highway 33?

How will the Sperry Avenue Highway 33 interchange be handled? Who will pay for the improvements of this intersection?

## Sperry Avenue, West

I-5 interchange improvements - In order to add an additional northbound on-ramp lane and a southbound off-ramp lane, a great amount of earth-fill be required. The cost would be much greater than a normal addition of an additional lane. Who will pay for I-5 interchange improvements? The EIR does not address the impacts of these costs nor how they will be mitigated.

## Salado Avenue Extension

This proposed extension does not address the problem of how the extension is to take place. For Salado Avenue to be extended, there are only three choices between Ward Avenue and Lateral M.

Two of those choices would require the destruction of existing residences or the FDES hall. The third choice, through the Sorenson property, would be too far north to make a proper intersection.

The impacts on these properties is not addressed. Nor is the method of accomplishing this extension addressed.

## Salado Creek Street

A road is shown on top of or next to Salado Creek west of Ward Avenue. How is this to be accomplished? What will be the impact on the residents in that area?

How will intersection with Ward be handled with Salado Creek bridge, etc.?

The extension of this street between Salado Creek and Baldwin has Reserve Land on one side. How will this street be paid for without development on north side within 20 year plan period?

Impacts not adequately specific or quantified.

## Bypass/Bartch

Page IV-5, paragraph 6 re time frame - This paragraph assumes development to 15,000 in 10 years and yet other parts of Draft EIR and Measure J vote specify development to 17,000 by 1997. This an inconsistency in the Draft EIR which should be corrected.

What about staging of the bypass? The Draft EIR can not be adequate if it does not say how this bypass is to be financed. Just saying that it will be accomplished at certain points does not make the Draft EIR legally adequate.

What is the impact going to be of bypass on houses on Bartch Avenue? If the bypass isn't on Bartch what additional impact will there be? What about development, growth inducement in this area? Removal of more farm land? These impacts are not addressed.

### Circle impacts

The impact of traffic going around the Circle in order to reach the shopping area immediately to the West is not addressed: The Circle is of primary importance in preserving the downtown character. That character will be destroyed if the Circle becomes a major route between Highway 33 and the Shopping Center at West Las Palmas and Ward Avenues.

Impacts not adequately specific or quantified.

### West Las Palmas impacts

What are traffic impacts of East Las Palmas 4 lanes into Hwy 33 then 2 lanes around circle and west to shopping center? Alternate routes should be provided for residents going to shopping center from east side, such as extending Orange Avenue to Hwy 33.

The Draft EIR does not address the impact of making West Las Palmas a major thoroughfare between downtown and the shopping center. What will be the impact on the residences facing West Las Palmas? What impacts will there be on Las Palmas School?

### Orange Avenue

Why isn't Orange Avenue being extended to intersect with Hwy 33? No buildings would be effected - at this time.

Anyone who knows the history of the South 1st Street and "E" Street area can see that "E" Street between 1st and Highway 33 should eventually be closed (retain utilities easement). 1st Street from Las Palmas to Orange Avenue is not adequate for a collector street. Every effort needs to be made to reduce traffic on South 1st Street between Las Palmas and Orange Avenue.

It would be easy to make Orange Avenue a four lane street all the way to Highway 33 at this time. This would allow it to serve as a major east west route until the By-pass is built.

Since the south side of Orange is designated as industrial, making Orange Avenue four lanes would have many advantages. The Hartley north south connection makes this even more true.

A major traffic/planning error will be made if Orange Avenue is not extended to Highway 33. This is even more true if the City should agree that



East Las Palmas is not suitable for four lanes. The traffic must go someplace until the Bypass relieves the situation.

### Walnut/M street alignment

It has been known since it was built that the M Street railroad crossing was mis-aligned. This property is presently for sale. The City should go on record as having an intent of making the Walnut/M street link straight across. The Draft EIR does not address this problem.

### 9th St.

9th St. between "E" and Sperry Ave. is not shown as having "collector" status and yet this is an obvious connection for through traffic going East on Sperry and then turning north. This through link is also made with development on 9th south of Sperry and probably all development south of Sperry in this area. Clover has "collector" status, but where is the link with 9th?

Many traffic impacts not adequately specific or quantified.

## HEALTH AND SAFETY - SEISMIC HAZARDS - Page VIII-1

### From the Patterson Irrigator - April 9, 1991

"(Carl) Wentworth's (a scientist of the U. S. Geological Survey in Menlo Park) studies delve deeper into the earth. In a recent paper, he argued that the 1983 earthquake which leveled Coalinga, 60 miles south of here, was caused by a thrust fault underlying the west rim of the Central Valley."

"Wentworth says that seismic reflections and other data taken the length of the Coast Range indicate a similar quake could happen anywhere between Bakersfield and Redding."

From May 1987 Patterson Irrigator article: "...causing catastrophes such as the Coalinga earthquake."

"Wentworth, citing conclusions of a million dollar investigation using seismic reflection equipment, said earthquakes of similar cause have occurred in the hills west of Patterson. In fact, the Coalinga quake could have occurred anywhere long the Coast Range as far north as Red Bluff."

### Tesla-Ortogonal Fault Zone proximity.

A U.S. Geological Fault activity survey indicates that an small earthquake was recorded in Del Puerto Canyon in 1941.

There has been at least one earthquake recorded east of Patterson near Carpenter Road in the last 10 years.

Neither the Draft General Plan nor the Draft EIR show Patterson in relation to this well known Fault.

This fault line starts north of the Altamont Pass travels south to this side of Mt. Oso, at this point only a few miles from the I-5 Sperry Avenue interchange, turns west through Del Puerto Canyon and then travels south through Adobe Canyon, through the middle of San Luis Reservoir and further south to the Coalinga Area.

### Coalinga/Livermore

Both of these communities have experienced earthquakes of destructive force, within the last 10 years. It is probable that the faults which triggered these local earthquakes are side faults to the larger Tesla-Ortigalita Fault. With Patterson some 6 miles from the Tesla-Ortigalita Fault line, it must be recognized that this fault may be capable of local destructive force in this area. There are other distinctive geological features in this area which indicate that possibility. The Draft EIR is inadequate in its assessment of these seismic risks.

### Failure of California Aqueduct

A significant portion of the California Aqueduct directly west of Patterson and immediately next to proposed Commercial/Industrial area west of town, is built above ground. The Draft EIR does not address the seismic hazard these facilities face should the California Aqueduct fail in this area.

A "sag" weak point already exists in the California Aqueduct immediately north of the Sperry Ave. Aqueduct bridge.

The flooding from such a failure could not be mitigated easily. The loss of life due to such an event should be addressed in this EIR. The closer development occurs to this Canal, the greater the potential for loss of life. The draft EIR does not adequately address these hazards.

### Freeway interchange, bridges

Rebuilding the North Bound on-ramp to I-5 would require a major new earth fill addition. Immediately to the east, is the California Aqueduct built almost entirely above ground providing yet another seismic safety hazard.

The rebuilding of two major bridges over both the California Aqueduct and the Delta Mendota Canal to six lane standards would have to take the Seismic Safety situation into account. The Draft EIR does not address this problem either in cost impact or safety.

Seismic hazards have not been adequately specified or quantified.

## AREA POPULATION

See Delphia Draft EIR Comments Appendix A - Population alternatives compared.

Page III-2 discusses the 21,000 approved by the voters and yet all maps, except the Compact Core alternative, are for larger areas including the proposed main plan which calls for 26,000. The actual area included in the borders of the plan will allow for over 30,000 and with no stated controls, there is no General Plan method of keeping the population at any given level.

Where are the policy statements which give these goals teeth? What will stop the population from going beyond the 21,000 during 20 year plan?

Page III-8 Stating that the City wants to control growth is not adequate if there are no controls included in the General Plan. This section is inadequate.

Page II-6 Displaced population units do not add up. Insufficient quantification of these units.

### Area L

Why is area L left out of almost all plans? Half of this area is in the current General Plan and has traditionally been considered a natural part of Patterson's future development. In fact not including it will have an impact all its own since it is surrounded on two sides by already developed areas.

The alternative area shown in Figure IX-1, "Compact Core Area Alternative" leaves out Area L. 1/2 of area L is in the City of Patterson's current General Plan. This area does not contain prime ag land under anyone's definition. It is surrounded by growth on two sides, making it difficult to farm without significant impact on existing developed areas.

The "Compact Core" plan claims that it is deficient in population to meet the Measure J voters approved 21,000 population. Yet this alternative does not show the obvious addition of even part of Area L, which would bring the Compact Core area population to 21,000 or more. This alternative fails to provide an obvious mitigation potential as required by CEQA in answer to the loss of Prime Ag land.

The General Plan does not address the environmental impacts on leaving this area undeveloped.

### Appendix D, Build Out Calculations

These calculations have a discrepancy in Subarea R. A simple look at "infill" land within the City will show that these figures are too low. A set of figures accepted by the City Council in early February 1987 and used legally to halt additional annexations shows considerably more than 14 acres of land.

One piece alone contains 11 areas and two others contain 10. This total of 21 acres still doesn't cover other infill potential which could be very high if higher density as proposed for DR zoning in almost all of the original part of Patterson is adopted - the equivalent of 7 units per acre for existing lots. See Land Use Map area for existing Patterson downtown residential.



### Purpose of Residential Development

No where in the Draft EIR is there a recognition of the fact that new residential development is not being developed to supply homes for existing residents but instead the majority of the new homes are to be built for residents moving in from the San Francisco Bay Area. This impact should be addressed in the Draft EIR.

Impacts not adequately specific or quantified.

### FLOOD PLANE AREAS

The Draft EIR does not contain a map showing the Del Puerto Creek or Salado Creek flood planes. This map would show the impact of both Creeks on future Patterson development. While those maps may exist elsewhere as part of the General Plan documentation, the Draft EIR should stand alone on the issue of potential flooding in order not to mislead the average reader of the Draft EIR. To have the written information in one location and the relevant map in another is totally misleading and inadequate and could subject the EIR to serious legal challenge.

The Del Puerto Creek flood plan would be the most difficult to mitigate and this should be addressed if the Draft EIR is to be adequate.

Map - does not identify actual flood paths of various watershed areas. Corp of Engineers map should be included in EIR

Serious flood impacts not adequately specific or quantified.

### PARKS - Page VI-1

Phasing of main park which appears to be located west of Salado Creek. Since this land is far west of the towns present city limits, when can it be developed for use by existing residents?

Map Figure VI-1 shows no neighbor hood parks in the Poppy Avenue area. A detention basin park has been planned in this area, but was not considered sufficient for the whole area between Sperry, Ward, Bartch and Hwy 33, thus leaving a large area without park facilities. The impact is even greater if you consider that the area between Hwy 33, Las Palmas Avenue, Ward Avenue and Sperry Avenues is not served by a neighbor hood park, and yet this area is designed as high density DR in the land use map.

Impacts not adequately specific or quantified.

### SCHOOLS

How will high school expand? Across 9th into blocks?

Impacts not specific or quantified.

## LAND USE

Are blocks in Grid big enough to support the kind of office and commercial projects most commercial interests favor, such as new out of area

Why isn't the alternate plan for leaving Ward Avenue open, shown with a new drawing of the street layout rather than just imposing Ward Ave on the grid?

Why isn't the park at the intersection of Ward and Las Palmas enlarged in the Ward Avenue version?

Re Draft Land Use Diagram - The existing downtown R-1 residential area, plus some R-2 and R-3 (current zoning designations) are classified as DR on this map. If this map is to be used to rezone the downtown residential area, then I think you should be aware that this map, if adopted, would allow up to 10 units per acre on existing lots. It would in effect raise the current density by at least four units.

Question: how is this re-zoning to take place? Will the residents in these areas be willing to have their personal homes rezoned to what amounts to multifamily rezoning?

Will the downtown (DR) land use require that those areas be rezoned or will the Draft Plan be changed to reflect current zoning?

Impacts not specific or quantified.

Ward Avenue division between Estates and Residential - On the east side of Ward, there will be estates limited to one house per 10 acres. On the west side will be a minimum of 4 houses per acre. This discrepancy will cause serious problems as the 10 acre estates will be farmed, with associated problems, just as they are now.

Impacts not specific or quantified.

Impacts not adequately specific or quantified.

## DISCREPANCIES

Page II-3, C, paragraph 1: "No land outside the Planning Area..." The implication is that no development will take place within 20 years, and yet the City Council approved the Sperry Avenue Corridor agreement which specifies much more land for development on both the East and West of town. Development by the County with the Cities explicit approval, through the agreement and architectural control in addition to certain infrastructure uses, means there would be a significant impact which is not addressed in this Draft EIR. Therefore the draft E.I.R. is incomplete.

There are additional discrepancies, miscalculations and erroneous presumptions relating to development outside the General Plan area, during the next 20 years, in other parts of this Draft EIR.

Map problems - The General Plan "Planning Area" map following II-4, does not include Area L. This area is included on the blue print for Land Use and shown as reserve.

The traffic maps, after page IV-4, show Olive Avenue, North 1st Street and Sycamore Avenues as having "Collector" status. With the area being designated

as "Reserve" and not developable within the 20 year plan, how can these streets be improved and serve as collector streets?

To have the written information in one location and the relevant map in another is totally misleading and inadequate and could subject the EIR to serious legal challenge. This applies to all areas of the Draft EIR.

## MISSING CONTROLS

### Jobs/housing balance

See Addendum B - Copy of Modesto Bee article re S.F. Bay area proposals and studies.

The jobs/housing balance is not quantified or addressed in this Draft EIR in a way in which specific solutions can be implemented. The Draft EIR is inadequate if it does not address this problem by quantification.

Impacts not adequately specific or quantified.

## ADDENDOM B

This article quoting various experts re S.F. Bay Area's connection with development, and other regional impacts, in the San Joaquin Valley and Stanislaus County in particular points out that there are regional impacts that are not addressed in the Draft EIR. The Draft EIR is deficient in addressing regional impacts.

Impacts not adequately specific or quantified.

## EXISTING TOWN IMPACTS - Infrastructure costs

### Water and sewer costs

Page V-4, paragraph 2 is probably in error because it does not address the costs of treated water which current residents will have to pay in addition to new residents. Unless the General Plan proposes that new residents be on a separate water system, there is no way to keep current residents from having to sharing the increased costs of heavily treated water. Thus there will be significant impacts which need to be addressed in this Draft EIR.

Page V-3 deals with the direct exchange of irrigation water to water for domestic use. The studies are not sited. In addition the sources of water used for irrigation may not be dependable due to future drought conditions or other factors.

For example, a large part of the area west of town is served by the West Stanislaus Irrigation District whose primary source of water is the San Joaquin River.

In a direct exchange scenario, this water may not be available for non-farming purposes and may not be treatable for domestic purposes. This impact problem is not addressed in the Draft EIR.

Impacts not adequately specific or quantified.



Page V-1 re water.

Doesn't state that water is secured?

What is the impact of treated water. Who will pay for treatment? All residents?

New and old? It will be far more expensive to treat? These increased expanses for treatment should be covered in EIR and specify problems to exiting residents. Also what is impact of further contamination of well water and possible treatment?

What about funding for improvements for existing infrastructure such as streets, the cities part of Salado Creek solution, etc.?

Are the greater infrastructure costs addressed in the EIR re east versus west?

How will the additional costs of an expanded sewer treatment plant be assessed to existing residents? The Draft EIR does not address the impact of expansion on existing residents.

Impacts not adequately specific or quantified.

## INFRASTRUCTURE

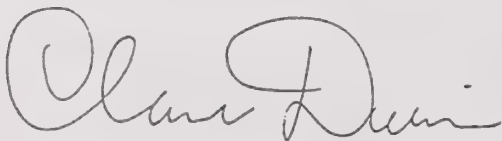
The Draft EIR is overall inadequate in addressing and quantifying infrastructure costs and solutions.

Bradly Inman, a highly respected Real Estate writer for the San Francisco Examiner, whose northern California stories also appear in the Modesto Bee, wrote the following in the San Francisco Examiner/Chronicle Sunday Real Estate section on April 21, 1991:

"Faced with a fiscal mess throughout state and local government... We can no longer afford building sprees in far-off locations where there are no highways, sewer services or transit systems. Without government funds to build the new infrastructure, developers finance it, but home buyers pay for it."

The Draft EIR does not address the impacts on new home buyers nor does it address those same and other impacts on existing residences re expanded infrastructure costs and operational expanses.

Impacts not adequately specific or quantified.



Claude Delphia  
425 H Street, Patterson, 892-6018

*Copies sent to Planning Commissioners*

# C. Delphia Draft EIR Comments Addendum A

May 13, 1991

## POPULATION COMPARISONS

### Alternatives

Planning Areas	Draft Plan	Full Buildout	East-West Plan	Compact Plan	Sources in EIR
Existing City Limits pop.	9,357	9,357	9,357	9,357	<-- From page II-5
Population, new	17,538	24,000	14,038	10,600	<-- From Appendix D, IX-3, IX-2
Adjustment	(191)				<-- From Page II-6
Totals.....	26,704	33,357	23,395	19,957	<-- From Page II-6
Add 1/2 OF area L .....				1,100	
Voters approved in "J"	21,000	21,000	21,000	21,000	
Excess over Measure J	5,704	12,357	2,395	57	

Please note that the Draft Plan and full "buildout" are directly related. Without controls for the main plan, full buildout is likely to result.

While some would say that all these figures are approximates, the problem is that you must base your decisions on all the possibilities. Including full build out. This is especially true if there are minimal controls. The GP as it stands, contains no controls.

The current General Plan area would certainly have been fully developed were it not for two factors: 1. The City didn't have enough sewer capacity; 2. the housing market flopped badly.

While another housing flop will occur in the next 20 years, it should be assumed that full build out can occur in the 20 year period.

Point - these figures allow for only about 400 people in infill population where as the City Council approved an infill figure of 800 in early '1987.

In the Draft EIR, 14 acres are set aside for "infill" increase within the current City Limits - the EIR area designated as "R".

I can identify the following areas for a more realistic total:

These are areas which are currently open land or for sale for dev.

First and Walnut 11

Weber Avenue 5

Ward Ave. 5

There are numerous additional individual sites available for single houses.

These population calculations do not meet the intent of CEQA, which is to present a General Plan and EIR which can be understood by an average citizen. The mere fact that no population comparison table was presented, which could be easily understood by laymen, means that the Draft EIR does not meet CEQA legal requirements potentially subjecting it to legal challenge.

# Bay Vision plan keeps valley out

## SF region hopes it can keep problems to itself

By TIM MORAN  
Bee staff writer

A report to be issued later this month calling for the creation of a new nine-county Bay Area regional planning agency warns that the Bay Area should not export its problems to Stanislaus and other adjacent counties.

The report by the Bay Vision 2020 Commission, a diverse group of private interests that has been working for the past year on a regional planning structure, urges the formation of a regional commission with responsibility for a wide variety of issues, including air and water quality, transportation, land use and affordable housing.

Despite the efforts of former Modesto Mayor Carol Whiteside, the commission's scope does not include Stanislaus County or any other counties beyond the traditional nine-county Bay Area: San Francisco, Alameda, Contra Costa, Santa Clara, San Mateo, Marin, Solano, Sonoma and Napa. Whiteside went before the commission last year to ask that Stanislaus County be included in the Bay Area's planning process because of growing commuter links and related problems.

The report recognizes that planning decisions in the Bay Area affect the surrounding counties, including Stanislaus, San Joaquin and Merced. It calls for inviting those counties to take part in planning sessions on issues of mutual concern, like housing and transportation.

"The Bay Area's efforts to manage its growth should not result in exporting problems to adjacent counties," the report says.

Many of the goals of the Bay Vision 2020 Commission, if met, would indirectly affect the Central Valley — including making affordable housing available in the Bay Area, working toward a jobs-housing balance within Bay Area communities, improving public transportation, bringing the Bay Area into compliance with federal and state air-quality standards, and assuring water quality in San Francisco Bay and the Delta estuary.

The regional commission would be cre-

## PLAN: Bay Vision 2020 sticks with nine-county region

drawn out to 14 or 15 counties, he said, but no one was proposing regional agencies to include all those counties.

The Bay Vision report is one piece of a confusing landscape of regional-government proposals throughout the state. There are four major statewide growth-management bills under consideration, including Assembly Bill 3, an effort by Assembly Speaker Willie Brown to create seven regional development agencies covering the state.

Bodovitz predicted that none of the regional proposals will be acted on this year, but action on Bay Vision's report and the state proposals is likely next year.

"What people don't understand is that the option of doing nothing doesn't exist. We are in a region of non-attainment for air quality, and air quality districts will be exerting an increasing control over land use," Bodovitz said. "The pot is bubbling. The question is what is the best way to do something."

intergovernmental affairs for the state Resources Agency, was philosophical about Bay Vision excluding the Central Valley in the scope of its report.

"The Bay Vision Commission was overwhelmed with the issues facing the traditional Bay Area counties," she said. "They acknowledged the Central Valley and the coast counties, but including them got very complicated and made it unworkable."

A dialogue between the Stanislaus Area Association of Governments and the Association of Bay Area Governments has resulted from her efforts, Whiteside said. "There is an increased recognition of the jobs-housing imbalance, and that's a monumental improvement," she said.

"Most people in the valley are not willing to relinquish planning to the Bay Area. But the dialogue is very important," Whiteside said.

Joseph Bodovitz, project manager of Bay Vision 2020, said, "We spent a lot of time agonizing over how to define the Bay Area." The area could have been

ated initially by merging several existing single-issue regional agencies, including the Bay Area Air Quality Management District, Metropolitan Transportation Commission and Association of Bay Area Governments. Others, including the San Francisco Bay Regional Water Quality Control Board and Bay Conservation and Development Commission, could be merged later, according to the Bay Vision report.

One of the recommendations is that the proposed regional commission come up with a fair means for the regional sharing of taxes from commercial, industrial and high-cost residential development, a concept that is likely to draw controversy. It is designed to end the "fiscalization" of land-use policy, in which cities encourage industrial and commercial development because of the tax advantages, but shun housing because of the costs of building schools and other public facilities.

Whiteside, now assistant secretary for



DEPARTMENT OF FISH AND GAME  
REGION 4  
1234 East Shaw Avenue  
Fresno, CA 93710  
(209) 222-3761



May 24, 1991

Rod Simpson  
City of Patterson  
P O Box 667  
Patterson, CA 995360

Dear Mr. Simpson:

Subject: City of Patterson Draft General Plan EIR; De Minimis  
Impact Finding; Responsibility, Pursuant to Fish and  
Game Code Section 711.4, Filing Fees:

Regardless of whether the above project will incrementally have environmental effects which were determined to exceed the CEQA "significant impact" threshold, (therefore warranting specific or general mitigation measures and/or preparation of an Environmental Impact Report), we believe the project will involve elimination or destruction of at least some habitat in combination with similar losses on other projects are becoming cumulatively important. For this reason, the project is not considered by the Department as "De Minimis" with respect to Fish and Game Code Section 711.4. As such, we believe the project is subject to the environmental review fees as therein described. If a Negative Declaration will be filed by the County pursuant to Public Resources Code Section 21080(c), the fee will be \$1250, payable to the County Clerk when the Notice of Determination is filed.

We point out that this law is intended to more fairly distribute the cost of protecting and managing fish and wildlife resources among the broad group of Californians who contribute to their short and long term reductions through habitat conversion and development.

If you have any questions or wish to discuss these comments, please contact John Beam, Associate Wildlife Biologist, at the above address or telephone.

Sincerely,

A handwritten signature in cursive script that reads 'George D. Nokes'.

George D. Nokes  
Regional Manager

cc: Project Applicant

K  
G  
F

Kenni G. Friedman

508 Andover Lane  
Modesto, California 95350  
(209) 529-0703

June 3, 1991

Planning Director  
City of Patterson  
P.O. Box 667  
Patterson, CA 95363

RE: City of Patterson  
General Plan  
Public Review Draft Environmental Impact Report

At the May 29 LAFCO meeting, Mr. Mintier reviewed with the Commission the Draft Environmental Impact Report. I had the following concerns which I expressed at the meeting:

- Air Quality Mitigation

Since there is a lack of a public transportation system, more consideration should be given to industrial and commercial developments which will employ residents of Patterson.

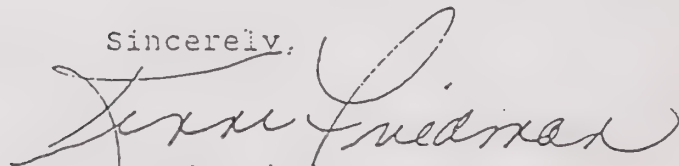
More significance should be given to the "Compact Core Area" alternative. Stanislaus County is a nonattainment area for air quality because of tail pipe emissions. The "Compact Core" alternative "would have less impact on regional air quality." In addition this alternative would use less prime agricultural land for urban uses, would create less demand for water and sewer services, fewer parks and schools and less demand on fire and police services.

- November 8, 1990 letter from LAFCO

Mr. Freitas letter from LAFCO expressing three comments has not been answered in this document.

Thank you for the opportunity to comment.

Sincerely,



Kenni Friedman,  
Stanislaus County LAFCO Commissioner



Department of Planning and  
Community Development

1100 H STREET

MODESTO, CALIFORNIA 95354

PHONE: (209) 525-6330

FAX: (209) 525-6507

June 3, 1991



George Gaekle  
Acting City Manager  
City of Patterson  
Post Office Box 667  
Patterson, CA 95363

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT - CITY OF PATTERSON GENERAL  
PLAN COMMENTS

Dear Mr. Gaekle:

Thank you for allowing Mr. Larry Mintier to present the Patterson General Plan Draft and the Draft Environmental Impact Report on the Draft General Plan to LAFCO at its May 29th meeting. The Commission appreciates the effort that the City expended to have Mr. Mintier make this presentation to the Commission, and thanks the City for the opportunity to comment.

With respect to the Draft Environmental Impact Report, members of the Commission had several questions and comments regarding some of the conclusions reached. The following are comments from the Commission:

- \* Page IX-2. Indicates that there is a compact alternative to the General Plan configuration. The question which arose is why the compact alternative was not chosen or why it was rejected. There are no comments as to why this item was rejected. The Commission felt that some discussion of rejection of this alternative should be included in the Final EIR.
- \* Page F-14. On November 8, 1990, a letter from LAFCO was addressed to Mr. Eric Brown, Planning Director regarding the Notice of Preparation of the Draft EIR. In that letter there were three items mentioned for discussion. Several of the Commissioners were concerned that the three items listed in the November 8, 1990 letter, were not addressed in the EIR. They felt the three items that were mentioned need to be included in the Final EIR. For the convenience of the consultant preparing the EIR, a copy of the November 8, 1990, letter is included with this letter.
- \* Another item that was of concern to the Commission was the issue of flooding along Salado Creek. The Commission is concerned that this item needs to have a substantial amount of discussion which was not provided. Salado Creek is a stream which floods after substantial amounts of rain. It effects a large amount of area both in the County and in the City of Patterson.



- \* Concern was expressed on how the rapid expansion of the City could be justified, and then how that expansion could then be slowed down. With respect to population growth there was concern by the Commission as to the composition of the population to be housed within the General Plan area. That is to say, what type of housing mix would there be with specific concern toward housing affordability?
- \* An overall comment regarding the EIR, is that this is a programmed EIR in which it has been stated that in order to implement various mitigation measures, policies have been developed and included in the General Plan. A question arises, if it is a policy to mitigate impacts, how can one be sure all policies are implemented?
- \* Page I-4. In the discussion there are policies to reduce the impact to lessen the significant level regarding the Swainson's Hawk foraging habitat. These mitigation policies indicate, "The City should work with the Department of Fish and Game in identifying an area or areas suitable for Swainson's Hawk habitat; this land should be preserved and put into mitigation land bank to mitigate impacts on existing habitat for these species." In order for a mitigation measure to be significant or a true mitigation measure, the word "should" needs to be removed and replaced with "shall". In addition, there is another mitigation policy, "The City should establish a mechanism for developer funding of acquisition and management of lands in the mitigation bank according to Department of Fish and Game Guidelines for the Swainson's Hawk and the Central Valley". Again, the word "should" needs to be changed to "shall". In fact, all mitigation measures or mitigation policies should have the implementing wording changed from a "should" to a "shall" to be a true mitigation measure.
- \* Pages II-7 and III-I, Tables II-5 and III-1. The information regarding acreages on these two tables do not seem to coincide. An example regarding the light industrial acreage shows a total acreage of 500 acres on page II-5 of 500 total acres, while on table III-1 light industrial is shown as 516 acres. Another example is heavy industrial shown on page II-5 as 96 acres and on page III-1 as 197 acres. This discrepancy needs to be explained as it makes deciding how many acres of each type confusing.

Thank you again for allowing Mr. Mintier to address the Commission. It was a valuable session with the Commission, and if you have any comments or questions regarding these comments, please do not hesitate to contact me or have the consultant who prepared the Draft EIR contact me at 525-7660.

Sincerely,



Fran Sutton-Berardi  
Senior Planner to LAFCO

cc: LAFCO Commissioners



DEPARTMENT OF THE NAVY

NAVAL AUXILIARY LANDING FIELD  
CROWS LANDING, CALIFORNIA 95313

June 13, 1991

Mr. Rod R. Simpson, City Planner  
P.O. Box 667  
Patterson, CA 95363

Dear Mr. Simpson,

I have reviewed the Draft Environmental Impact Report (EIR). I was very pleased to note that the Air Installation Compatible Use Zone (AICUZ) was considered in the promulgation of your EIR.

Naval Auxiliary Landing Field, Crows Landing wants to continue to be welcome neighbors with the city of Patterson and the adjoining communities. Working together we can have a noise free living environment and minimize hazards to aviation.

Thanks again for this opportunity to feel part of the community.

Sincerely

A handwritten signature in dark ink, appearing to read "W. A. Carpenter", is written above the typed name.

W. A. CARPENTER  
Lieutenant Commander  
U. S. Navy



Stanislaus Area  
Association of Governments

1315 I Street  
Modesto, California 95354-0913  
(209) 558-7830  
Fax 558-7833

June 19, 1991

Rod Simpson  
Planning Department  
City of Patterson  
P.O. Box 667  
Patterson, CA 95363

Dear Mr. Simpson:

Thanks for the opportunity to review the Draft EIR and Patterson General Plan Background Report. I would like to offer the following comments:

- 1) Page II-18, Table II-19 (Background Report). The SAAG Housing Needs Report estimates Patterson's construction need for the "Very low income" category at 231. Therefore, the "Very low income" (construction need) should be 231, in order to be consistent with the SAAG Housing Needs Report.
- 2) It would be advisable to send a copy of the Draft Background Report to the California Department of Housing and Community Development (HCD) for review, since HCD must approve the Housing Element.
- 3) It would be helpful if the issues and policies contained in Chapter IV, (Circulation and Transportation) of the Draft Environmental Impact Report, were carried over into the General Plan, Background Report. The current Chapter V of the Background Report (Circulation and Transportation) is very general and may be more appropriate for the Summary Section of the General Plan.

Please feel free to contact me if I can be of any further assistance.

Sincerely,



Dennis Brighton  
Associate Planner

F-22



## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



6/24

Tack S. Joe  
(415) 557-9884

June 18, 1991

Rod Simpson  
City of Patterson  
P. O. Box 667  
Patterson, CA 95360

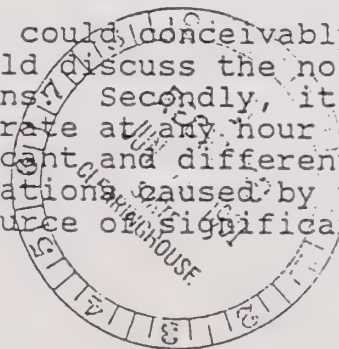
Dear Mr. Simpson:

This is in response to your Draft Environmental Impact Report covering the City of Patterson's General Plan, SCH #90021012.

Review of these documents does not seem to indicate that any consideration was given to the railroad operations and the impact caused by the railroad line bisecting the city into two parts, or the railroad noise and vibrations. The city presently has seven at-grade crossings which run parallel to State Route 3 and traverse the mainline of the Southern Pacific Transportation Company's tracks. None of these crossings are separated and three of them do not have automatic warning devices.

It would appear that if the population growth rate continues around the area that the City of Patterson will want to be able to traverse the railroad tracks without any hindrance or impediment. It may also be that the train traffic will increase in the future which could make this impediment most unfavorable. The staff believes that the City in its General Plan should consider at least one future separation of grades between vehicular and train traffic. This would allow its citizenry to traverse from one side of the City to the other unimpeded. This would also benefit its emergency services, such as police, fire and medical people, with unimpeded right of way. In case of an accidental railroad hazardous material spill or a railroad derailment which would require both sides of the City to be informed or evacuated, a separation structure would be very beneficial.

With the possibility that train traffic could conceivably increase in the future, the report should discuss the noise impacts caused by the operation of trains. Secondly, it should consider the fact that trains could operate at any hour of the day or night, making any impact significant and different. The report should also discuss whether vibrations caused by trains operating within this area will be a source of significant



impact. Mitigation measures should be given for any impact found to be significant.

As a responsible agency, the Commission would be concerned with the above matters. We appreciate having had an opportunity to review and comment on this matter, thank you.

Sincerely,



Tack S. Joe, Transportation Engineer  
Special Projects Section  
Railroad Safety Branch  
Safety Division

cc: State Clearinghouse

June 24, 1991

Comments on Draft E.I.R.

As applied to the April 10, 1991 Background Report.

From: Claude Delphia, 425 H Street, Patterson 95363 892-6018

Point 1.

I challenge the legality of opening and closing the public hearings on the Draft E.I.R. when the Draft Background Report as revised in the version dated April 10, 1991 was not available to the Planning Commission or the Public?

Point 2.

J. Laurence Mintier stated in his presentation to L.A.F.C.O. that the financial study done earlier was out of date and that a new study would be completed in August.

Since the true financial impacts of the Draft General Plan are not available during this comment period, I question whether the Draft E.I.R. as presented is adequate in addressing financial impacts on the community.

Point 3.

I challenge the use of Policy Statements as mitigation measures. The Draft E.I.R. is inadequate if mitigations are based on none enforceable Policy Statements which are subject to the vagaries of day to day politics.

Point 4.

Annexation History Page I-4 re Map No. 26 annexation date. Annexation procedures on this property began in mid 1975.

The two annexations listed as "N/A" were both initiated by current residents of the City of Patterson. Therefore it is hard to understand how these dates can be listed as "N/A". Did anyone bother to look in the files at City Hall?

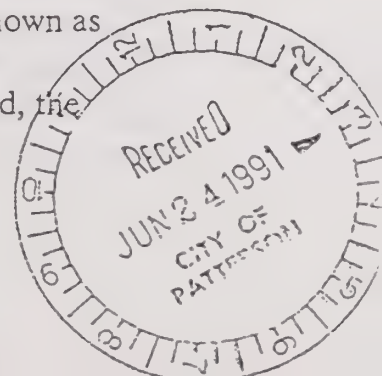
Point 5.

Figure I-5 contains a minimum of 6 major zoning mistakes which are compounded throughout various maps used in the draft General Plan.

Likewise Figure I-6 contains major mistakes in land use and numerous omissions of land use. The most glaring mistake is the newly developed areas north and south of East Las Palmas and the new development areas between Sperry and Poppy. The areas appear to be "shaded" in something other than Residential.

Figure I-7 also contains similar errors. Several large tracts of land are shown as vacant when in fact they are not and additional land which is vacant is shown as used.

Figure I-8 does not show at least one major piece of City owned land, the "detention basin", on East Las Palmas.





Point 6.

The Major Developments tables, I-5, do not list Newmans expansion. Thus the DEIR does not address this impact. One sentence mentions Newman, but there appears to be no quantification.

Point 7.

Overall, various mistakes in the Background report indicate a lack of understanding between the consultants teams and what actually exists in legal documents, maps and land use in Patterson.

Point 8.

Findings - Page I-27. The first statement makes an assumption - "The plan also provides for only limited growth outside the present city limits." since the area outside the current city limits but within the 1978 General Plan could contain 3 or 4,000 residents, this statement can only be true in comparison to some need not previously established in Draft Background Report.

The second to last Statement is also misleading. It does not point out that construction and new developments have come to a standstill during the last year due to a downturn in the overall U.S. economy and particularly a downturn in new home sales. This paragraph implies that there is a continuing pressure for development in this area whereas the truth is that there is no proof either way that the growth pressure exists.

In late 1990, the City of Patterson approved two new subdivisions. As of this date there is no indication that either one of the developments have plans to proceed with construction. Adjoining developments have numerous houses sitting empty. Elsewhere in Patterson other new homes sit unsold.

In nearby Modesto, whole subdivisions/developments are resorting to auctions in order to sell the homes.

In the newspapers of the weekend of 6/23/91, news articles point out that a previous upturn in residential sales has flopped.

Various financial experts have stated that financing for new subdivisions and commercial development such as shopping centers will never be as easy as it formally was due to the S & L crisis and the trouble banks are facing at this time.

Given the problems that have also occurred with both Mello-Roos bonding districts and Marks-Roos bonding pools funding, financing of development infrastructure needs may not be available as anticipated.

Point 9.

Page II-7, implies that Patterson has a larger amount of over crowding than other cities. There does not appear to be any proof of this proposition. Since Patterson's population has increased by some 4,000 over the last 6 years, and since almost all the houses are 3 bedrooms, it could be that we have a larger number of

large families residing in Patterson. The figures given do not "prove" or adequately quantify that overcrowding exists. The statistics do not prove that.

Point 10.

The map, Figure II-2, contains errors in that commercial and industrial areas are included in one area and the same occurs on the east area which also includes parts of a new subdivision.

Point 11.

Page II-9 re housing sales stats. It states no information on size or condition is available. This points up the lack of information which points back to the problem in Point 9. Without knowing the size of homes sold, you can't make a determination as to whether there is overcrowding or not. The DEIR appears to have many assumptions based on inadequate information.

Point 12.

In general, the DEIR continuously uses outdated figures on housing units and other issues. Using inadequate and outdated figures puts into serious question, the adequacy of the DEIR.

See tables II-18, II-20, II-21 which are dated 1980.

See tables III-3,4,5.

Point 13.

Figure VI-4, shows Shire Park subdivision as part of Patterson Water District?

Point 14.

Figure VI-6 does not show other parts of Patterson which have suffered from flooding by Salado Creek.

Point 15.

Figure VII-1 does not show the portion of Lateral M which passes through much of the west side of the incorporated town.

Point 15.

Figure VII-3 does not include soils for the southern portion of the Campbell Ranch. If this area is included in the General Plan, the soils map will not be adequate for the DEIR.

Point 16.

Figure VII-4 does not show southern portion of Campbell Ranch Williamson Act Status.

Point 17.

Figure VII-5 shows no Agriculture on the on the area bounded by 9th, Ward and Sperry Avenues but shows Agriculture on industrial and residential land on the southeast side of East Las Palmas and South 1st Streets.

Point 18.

Section VIII does not include the air quality deterioration due to the increased housing in Patterson.

The findings on Page VIII-24 should have included the pollution generated by housing development.

Point 19.

IX-4 re Tesla-Ortogonal Faults - See my first set of comments re DEIR. One paragraph on this fault is totally inadequate.

Figure IX-1 - A map of faults should have been obtained from the National Geological Survey who would also have more up to date information on faults in this area.

Point 20.

Flooding Hazards - Page IX-9. The information on Salado Creek is totally inadequate. It does not point out that in 1958, Salado Creek flooded the downtown business district and most of the area between 4th Street, the Circle, Highway 33 and Salado Creek.

Nor does the report note the severe flood of 1980 which flooded a residential section on Lilac Avenue and Barros Avenue and caused damages in excess of \$1,000,000 to the City of Patterson.

Del Puerto Creek isn't even listed and yet the Army Corp of Engineers has determined that the City of Patterson could be threatened by this Creek.

The map, Figure IX-2, shows the flooding potential from Del Puerto Creek starting at Zacharias and Rogers Roads and spreading towards the Northwest Territory.

This map also does not show any flooding hazard from Ward Avenue west on either side of Sperry and yet almost all of these areas have suffered serious flooding from Salado Creek since 1958.

On the east side of Highway 33, the flooding pattern shown does not match Figure VI-6 for flooding between Walnut and Olive Avenues.

This section of the Health and Safety element is totally inadequate, misleading and could be subject to serious challenge in court. At the very least it should show that flooding has occurred within the last 33 years on the two largest pieces of land proposed for future expansion, the Kaufman and Broad and Campbell Ranch pieces.

Point 21.



Figure IX-5 shows a noise potential for Pacific Tomato Growers. This site outline is not consistent with zoning maps used elsewhere in the Background Report or other General Plan maps.

Point 22.

Again we have a map, Figure X-2, shows agriculture on existing finished subdivisions, residential projects (El Solvo Village), and Commercial/Industrial lands (Thompson Chevrolet, etc.).

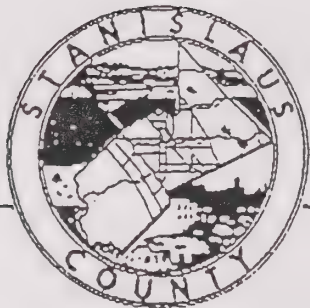
Point 23.

Various cities in this part of the San Joaquin Valley have done studies which show that new residences do not pay for the services they generate unless the houses built have a value over certain levels, such as \$160,000. A recent article in the Modesto Bee stated that one area city had determined their figure to be \$200,000 before they would obtain enough in property and sales taxes to offset their share of costs for basic city services such as police and fire.

Since a similar study has not been done for Patterson, the DEIR is deficient in its study of the financial impacts of new development over the life of the General Plan.

# Stanislaus County

## Department of Environmental Resources Air Pollution Control District



1716 Morgan Road  
Modesto, California 95351  
(209) 525-4152

June 24, 1991

Planning Director  
City of Patterson  
P.O. Box 787  
Patterson, CA 95360

RE: Draft EIR for Patterson General Plan


The Draft EIR notes on page I-3 that the development allowed under the proposed General Plan will have a significant impact on regional air quality that can not be mitigated to insignificance. The San Joaquin Valley Unified Air Pollution Control District (Unified District) agrees with this assessment. The Unified District expects that the City will provide all feasible mitigation.

Listed below are some of the specific comments we have on the General Plan.

1. All references to the Stanislaus County Air Pollution Control District should be changed to San Joaquin Valley Unified Air Pollution Control District since the Stanislaus Air Pollution Control District no longer exists.
2. Policies under Goal III.G should include one that encourages pedestrian and bicycle access to and from various uses to be direct as possible and not circuitous. Many modern residential designs discourage bicycle and pedestrian traffic because they are designed to discourage pass through motor vehicle traffic. This has been overcome in some cities by providing pedestrian and bicycle paths through the ends of cul-de-sacs to the adjacent arterials or collectors.
3. Implementation programs for Transportation and Circulation should include review of specific projects by the City Planning staff to ensure adequate pedestrian and bicycle access has been provided.
4. The implementation program for Transportation and Circulation should have a mechanism to guarantee that the Non-motorized Funds of the Transportation Development Act are actually used for pedestrian and bicycle projects.

5. Under policy VI.D.1 the City will "work with" the Air Pollution Control District to ensure attainment of air quality standards. This might be expanded to include a statement that the City will cooperate with Unified District's programs required under the federal and state Clean Air Acts. There will be several programs under these plans that will help reduce air quality impacts from future growth.

Thank you for the opportunity to comment on this General Plan.



DAVID L. JONES  
Air Pollution Control Specialist



## GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET  
SACRAMENTO, CA 95814



Jun 24, 1991

ERIC BROWN  
CITY OF PATTERSON  
P.O. BOX 667  
PATTERSON, CA 95363

Subject: GENERAL PLAN UPDATE - CITY OF PATTERSON  
SCH # 90021012

Dear ERIC BROWN:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation. These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Russell Colliau at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

A handwritten signature in dark ink, appearing to read 'David C. Nunenkamp'.

David C. Nunenkamp  
Deputy Director, Permit Assistance

Enclosures

F-32

cc: Resources Agency

## DEPARTMENT OF TRANSPORTATION

P.O. BOX 2048 (1976 E. CHARTER WAY)  
STOCKTON, CA 95201

(209) 948-7838



June 19, 1991

10-Sta-5 PM 15.8  
City of Patterson  
General Plan DEIR  
SCH # 90021012

Mr. Russ Colliau  
State Clearinghouse  
1400 Tenth Street  
Sacramento, CA 95814

Dear Mr. Colliau:

Thank you for the opportunity to review and comment on the City of Patterson's General Plan Draft EIR, SCH # 90021012.

Caltrans recognizes that the prepared document constitutes both a Program EIR and a Master Environmental Assessment for the General Plan. Therefore, the impacts related to traffic generation may be used in subsequent EIR's for various purposes. Caltrans' concern relates to the Sperry Road Interchange and to the mainline of I-5 in the vicinity of Patterson.

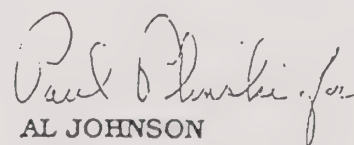
The population buildout and the consequent traffic generation will have major impacts on the Sperry Road interchange area and will add significant traffic to Interstate 5. Mitigation for these traffic impacts must include a mechanism for staging improvements to the interchange, participation for funding responsibility by the development community and inclusion of mitigation fees for mainline improvements on I-5.

Caltrans, Merced Association of Governments, Stanislaus Area Association of Governments and San Joaquin County Council of Governments are currently embarking on a study of the future impact of traffic to the I-5 corridor. Results of this study will define a methodology for mitigating traffic impacts that result from new development. This study will provide a basis for funding required for future improvements.

Caltrans will reference this document in commenting on future development and the cumulative effects of development in the Patterson area.

If you have any questions, please call Mr. Michael Hinshaw at (209) 948-7958.

Sincerely,

  
AL JOHNSON  
IGR Coordinator

F-33



Attachment

# Memorandum

Date : May 23, 1991

To : 1. Projects Coordinator  
2. City of Patterson  
P. O. Box 667  
Stanislaus, CA 95360

From : Nadell Gayou, Chief  
Environmental Review  
Department of Water Resources



Subject : City of Patterson Draft General Plan EIR (SCH #90021012)

The attached response signed by Everett Astleford, dated 5-22-91 constitutes the Department of Water Resources comments and recommendations on the subject report.

Attachment





## OFFICE MEMO

TO:

Nadell Gayou  
ROOM 449

DATE:

May 22, 1991

SUBJECT:

SCH 90021012, City  
of Patterson  
General Plan,  
1990-91

FROM:

Everett Astleford, Chief  
MAINT. ENGR. O&M

EAS-22

Our Staff has completed a cursory review of the City of Patterson General Plan for the 1990-91 year, dated April 10, 1991, and identified as SCH No. 90021012.

The General Plan outlines the City of Patterson's projected growth through the year 2010 and the need to re-zone existing agricultural lands to accommodate further growth, anticipating and increase in Bay Area commuters who wish to live in the City of Patterson.

The westerly end of the General Plan planning area abuts the easterly right of way of the California Aqueduct in Stanislaus County. This Abutment runs approximately 3/4 to 1 mile northwest and approximately 1 mile southeast of the intersection of Sperry Avenue and the easterly right of way of the California Aqueduct for a total distance of approximately 2 miles. The future use for these abutting parcels of land is designated as Business Park and Highway Commercial.

Because these abutting parcels are downstream of the Aqueduct we see no foreseeable negative impact on State Water Project operations. The expansion of Sperry Avenue appears likely due to increased traffic from Interstate-5 towards Patterson City. This expansion could disrupt the Department's existing O&M access road via Sperry Avenue. Due to the development's proximity to the California Aqueduct, DWR desires to review the engineering plans and specifications when they become available. All submittals should be sent to Mr. Brook Baxter, Department of Water Resources, Division of Land and Right of way, P. O. Box 942836, Sacramento Ca. 94236-0001.

cc: Al Jones, Delta Field Division

## Memorandum

6/2

To : Mr. Russ Colliau  
 State Clearinghouse  
 Office of Planning and Research  
 1400 Tenth Street, Room 121  
 Sacramento, California 95814

Date : June 5, 1991

Place : Sacramento

From : Department of Food and Agriculture --1220 N Street, P.O. Box 942871  
 Sacramento, CA 95814-0001

Subject: SCH No. 90021012 -- The City of Patterson General Plan

The California Department of Food and Agriculture (CDFA) has reviewed the Draft Environmental Impact Report (DEIR) on the above referenced project. This project would involve the conversion of agricultural land to urban uses and the cancellation of Williamson Act Contracts. The CDFA has the following comments and recommendations regarding the following issues.

(1) Conversion of Prime Agricultural Land

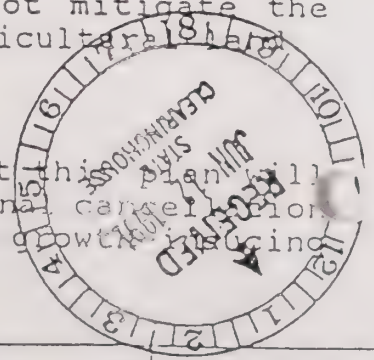
As stated in the DEIR, this proposed General Plan would involve the conversion of 2500 acres of prime (the majority of the area's soils are of Class I or II) agricultural land to urban or industrial uses. The CDFA does not approve of the conversion of prime agricultural land. Although the DEIR mentions possible mitigation measures to be taken in response to this conversion of agricultural land, a more site specific discussion of these measures needs to be discussed in the Final EIR, especially regarding the proposed phased development.

(2) Cancellation of Williamson Act Contracts

The DEIR states that several Williamson Act contracts must be cancelled to implement the proposed General Plan. The Background Report provides a map of the relevant agricultural lands under Agricultural Preserve (Figure VIII-4). In addition, the DEIR also claims that cancellation of these contracts is a less than significant impact on the environment. We at the CDFA disagree with this claim since: (1) a large portion of the relevant lands under contract are prime, thus cancellation of those contracts is a significant impact (CEQA Guidelines Appendix G(y)); (2) controlling the rate of conversion, as proposed in the DEIR, does not mitigate the significant impact of conversion of prime agricultural land.

(3) Growth-inducing Impacts of this General Plan

The two above stated issues both indicate that this plan will be growth-inducing and will lead to the additional cancellation and conversion of agricultural lands. These growth-inducing



impacts are contradictory to the original intent of the Williamson Act, thus the CDFA concludes that this General Plan is also in conflict with the intent of this Act.

The Final EIR needs to include a detailed map of the prime agricultural lands in the surrounding areas of the project site, as well as the land under Williamson Act contracts in these areas.

The CDFA supports the right of local agencies to develop and implement land-use policy in its area of influence. However, the CDFA wants to assure that agricultural land is not prematurely and irreversibly lost due to development which is not accurately assessed for environmental impact.

Sincerely,

*Mary McNally*

Mary McNally  
Graduate Student Assistant  
Agricultural Resources Branch  
(916) 322-5227

cc: Office of Planning and Research  
Stanislaus County Agricultural Commissioner  
California Association of Resource Conservation Districts



# Stanislaus County



## DEPARTMENT OF AGRICULTURE AND WEIGHTS AND MEASURES

725 County Center III Court  
Modesto, California 95355  
525-4610

July 5, 1991

Rod Simpson, Planning Director  
City of Patterson  
33 S. Del Puerto  
Patterson, California 95363

Dear Mr. Simpson:

I have completed a review of your city's proposed General Plan revision and I have enclosed my comments. As I stated throughout my review, this proposed expansion will greatly affect this department's workload. Most of the anticipated workload will be inspecting gasoline dispensers and scales, alongwith conducting Quantity Control audits and undercover purchases. At buildout, it is estimated that the county's cost to provide the mandated level of service will be \$31,400 annually, in today's dollar.

To mitigate this increased county cost, a fee of approximately \$9.25 per residential unit should be assessed. An appropriate dwelling fee is necessary to offset this department's increased costs/workload.

Respectfully,

Keith Mahan  
Agricultural Commissioner & Sealer  
Weights and Measures

# Stanislaus County



## DEPARTMENT OF AGRICULTURE AND WEIGHTS AND MEASURES

725 County Center III Court  
Modesto, California 95355  
525-4610

July 1, 1991

### CITY OF PATTERSON GENERAL PLAN PUBLIC REVIEW DRAFT

#### POLICY DOCUMENT:

Page II-1 (I.A.2)-- "development agreements"

These agreements need to address additional county costs due to the proposed populations increases.

Page II-1 (I.A.4.)--"and in pace with the expansion of public facilities and services."

The impact on county services/workload also must be considered.

Page II-2 (I.A.11)--"The City shall seek a formal agreement with the County concerning land use and infrastructure along the Sperry Avenue and East Las Palmas Avenue corridors to ensure that development in this area complies with City building and design standards, will hook up to City sewer service, and will participate in solutions to Salado Creek and Black Gulch Creek flooding."

Such a "formal agreement" must work both ways. The economic impacts upon county workload due to this population increase must be addressed.

Page II-2 (I.B.5.)--"The City shall ensure that new residential development pays its share in financing PUBLIC FACILITIES AND SERVICES."

The County should also be involved in this endeavor. Increased County costs must be mitigated.

Page II-4 (I.F.1)--"The City shall designate adequate, appropriately-located land for City, County, School District, and Hospital District facilities."

This is essential as Patterson's growth will definitely increase county costs and demands for services which in turn will create the need for

space. If, as envisioned, the city of Patterson becomes the hub for the Westside, county facility needs must be identified, sited, built and operated. Such planning must be started in this document and carried throughout the entire process.

Page II-6 (I.10.)--"The City shall undertake a space-needs study for the development of a new public safety facility for the Patterson Police and Fire Departments, as well as other service providers who might appropriately be located in such a facility."

Other service providers could include Sheriff, Fire Warden, Animal Control, Department of Environmental Resources, Agricultural Commissioner/Sealer, or several other agencies. All of the mentioned departments are primarily enforcement. Such a centralization of services would be cost effective and efficient.

Page II-9 (II.D.3.)--"The City shall ensure that new residential development pays its share in financing public facilities and services."

Increased county costs should also be considered.

Page II-15 (III.A.5.)--"The City shall promote development of an expressway..."

The study for this proposal MUST explore the adverse impact upon agribusiness operations that this expressway will cut through. Increased vehicular traffic will certainly impact agriculture negatively. Slow-moving agricultural vehicles will present a traffic hazard, especially in fog or other poor weather conditions.

Page II-16 (III.B.3.)--"The City shall encourage the establishment of private taxi service in Patterson."

This is just one small example of increased workload for this department. The Weights and Measures division must annually inspect the taximeters.

Page II-18 (III.H.1.)--"The City shall support the continued use of the Patterson Airport as an agricultural airstrip, although supporting some recreational use of the airport."

The proposed development around this site will stop the agricultural use of this airport. Surrounding development will object to the noise of the aircraft as well as the location of hazardous materials. Agricultural aircraft sometime encounter engine troubles that may necessitate an emergency release of the material being carried. Development around the airstrip would prohibit such an action or, if it did occur, would result in non-involved people being exposed to hazardous materials. This in turn would involve this office in an investigation. In addition to the problems already mentioned, including "some recreational use" increases the possibility of an accident occurring. Such an accident could be a mid-air



or ground collision resulting in loss of life, property damage (possibly surrounding buildings), and a hazardous material incident. Vehicles carrying agricultural chemicals to the airstrip would more likely to be involved in an accident due to the increased traffic on Sperry Avenue. Before the City endorses "recreational uses" at this site, testing for hazardous materials had best be conducted.

Page II-19 (III-4.)--"The City shall undertake a study of the southern bypass expressway to assess environmental impacts."

This proposal will definitely impact agricultural operations in a negative manner. Agricultural vehicles usually move at slow speeds and thus will present a traffic hazard to other users of the roadway. This will especially be true during periods of poor visibility. The proposal will very likely split parcels in such a manner as to destroy their agricultural economic viability and thus hasten their sale for non-farming uses. Thus, this proposal may very well be growth-inducing.

Page II-27 (IV.I.4.)--"The City shall promote the clustering of public and quasi-public facilities... The City shall promote joint-use of public facilities, agreements for sharing costs and operational responsibilities among public service providers."

All county facility needs must be addressed. This population growth will increase demands on many county departments such as Weights and Measures, Animal Control, Library and Environmental Resources, to name only a few. How and where these county agencies will be housed must be addressed and solutions found. County service impacts must be determined and mitigated.

Page II-37 (VI.A.6.)--"The City shall support efforts at the county, regional, and statewide levels to reduce runoff of toxic agricultural chemicals into Salado Creek and the San Joaquin River."

There is currently a study being conducted on the Westside to determine the best irrigation management practices. This study is being conducted by the Westside Resource Conservation District, Soil Conservation Service, and U.C. Cooperative Extension. In addition, the California Department of Food and Agriculture (C.D.F.A.) has formed in cooperation with the Regional Water Quality Control Board, U.S. Geological Survey (U.S.G.S.), and the California Department of Fish and Game, a San Joaquin River Working Group. C.D.F.A. has formulated and implemented the San Joaquin Basin Plan Pesticide Study. In order to carryout this plan, the Regional Board, C.D.F.A., and U.S.G.S. are taking water samples from the San Joaquin River this summer. These studies will greatly expand our knowledge of how and what may be entering the Westside waterways.

GOAL VI.B.--"To promote the productivity of agricultural land surrounding Patterson and to prevent the premature conversion of agricultural land to urban uses."

To fulfill this goal, the City should work closely with this office in

order to keep interface conflicts to a minimum. Cooperation would include discussing and requiring mitigation measures such as barriers or buffers as well as the education of people moving into the area as to how agriculture operates. This office is ready and willing to work with the City in order to make Goal VI.B successful.

Page II.38 (VI.C.2.)--"The City shall support state and federal laws and policies to preserve populations of rare, threatened, and endangered species by ensuring that development does not adversely affect such species or by fully mitigating adverse effects."

All of the proposed development west of Highway 33 is included in the San Joaquin Kit Fox's range.

Page VI.C.3.--"Unless there are significant, overriding considerations, the City shall not approve projects that would cause unmitigatable impacts on rare, threatened, or endangered wildlife or plant species."

The City will not decide what are significant, overriding considerations. The U.S. Fish and Wildlife Service will make the decision and this agency does not usually acknowledge any reasons for unmitigatable impacts on flora and fauna that are protected by the Endangered Species Act. For state protected species, the California Department of Fish and Game will decide.

VI.C.4.--"The City shall support and participate in local and regional attempts to restore and maintain viable habitat for endangered plant and animal species."

This concept can be very expensive and success has been sporadic. In addition, some ideas that have been proposed for other projects have actually increased the potential for conflicts which could result in human injuries and property loss. The City should consult with this office.

VI.C.6.--"Golf course development shall incorporate, where feasible, areas of native vegetation and wildlife habitat."

Humans and most wildlife are incompatible. Wildlife will often relocate to other areas when humans are present, so previous habitat areas are left vacant or are insufficient to support a viable population.

Page II-51 (VIII.A.7.)--The City shall seek to maintain a distinct agricultural definition to the urban edge of the city as a means of emphasizing Patterson's small-town qualities and agricultural heritage.

In order to accomplish this policy and to minimize urban/rural conflicts, the City needs to work with this office in establishing effective buffers and legitimate uses of the transition land. This is a difficult problem and is best dealt with through a cooperative effort between the responsible governmental agencies.



CITY OF PATTERSON  
GENERAL PLAN  
DRAFT ENVIRONMENTAL IMPACT REPORT

Page IV-5 "The need for the southern bypass roadway will arise in about 10 years"

The impact upon agricultural operations in the area proposed for this roadway are not addressed. This will most likely be a growth inducing project.

Page V-1 "Public Facilities and Services"

The population increase planned in this proposal will greatly increase the demand on many county-only provided services. This EIR only addresses an extremely select few of the county departments affected by this growth. Departments such as the Agricultural Commissioner/Sealer of Weights and Measures, Animal Control and several other county agencies are ignored. These departments will experience increased costs to provide the expanded services mandated by state laws and demanded by the public. These city-generated increased costs need to be addressed and mitigated.

Page VII-2 "Infiltration of farm chemicals and downward leaching of salinity, primarily from lands currently producing field and row crops, would be reduced."

This is an extremely broad and general statement. Water well testing results nationwide show that in excess of 98% of all wells show no chemical contamination. Only two water wells on the Westside have tested positive for chemical contamination and neither of them are inside of the proposed Patterson growth area. In fact, agricultural irrigation methods are a major source of groundwater recharge. Removing land from agriculture and paving it over could result in lowering the groundwater table. Also, since the City plans to continue using groundwater as the principal source of domestic water and agriculture irrigates using water from the state canal system as well as groundwater, the local water table will face an increased demand. Such an increased demand could lower the water table which in turn could result in salt intrusion and thus lower water quality.

Page VII--7 Table VII-3 addresses the economic impact of agriculture within the designated growth area.

Considering that agriculture is the major employer in the Patterson area, the loss of this income will have far reaching negative impacts. A loss of nearly \$30 million will be difficult to recover.



Page VII-7 VI.B.1. The City needs to work with this office in order to successfully implement this policy.

Page VII-8, 4. Mitigation Measures - "The loss of agricultural lands is, therefore, a significant adverse impact that cannot be mitigated to a less-than-significant level."

This is a correct statement in that there is no way to significantly lessen the adverse impact of losing agricultural production land.

Page VII-9 The EIR does not propose to conduct a study for the San Joaquin Kit Fox. Because most of this plan does occur within the U.S. Fish and Wildlife's range map of the endangered species, a study may be required. Failure to conduct a survey for endangered species, both state/federal and flora/fauna, could produce an unpleasant surprise if such a species is detected during the development.

Page VII-14 The estimated makeup of San Joaquin Valley-wide PM-10 as per Kern County Air Pollution Control District is as follows. Wind Blown Dust (37.27%), Paved Road Dust (17.27%), All Other Sources (14.0%), Unpaved Roads (13.64%), Farming Operations (12.73%), and Construction (5.09%). Based on these estimates, the statement that development would reduce PM-10 emissions in the Planning Area is questionable. Given that farming operations would decrease the second largest contributor, Paved Roads, would definitely increase as well as construction. Because this is an extremely complex issue, it cannot be automatically assumed that by reducing agriculture, a net PM-10 reduction will occur.

Page F-9 Issue 17: Airports

As discussed earlier in this response, the continued agricultural use of this airport is extremely unlikely due to the incompatibility between crop dusters and development/people.

Page F-10 Issue 18: Agricultural Lands

The City should work with this office to minimize urban/rural conflicts.

CITY OF PATTERSON  
GENERAL PLAN  
BACKGROUND REPORT

Pages II-7 and III-4 Table II-7 shows that the makeup of Patterson's average household size is larger than the county's average, 3.33 to 2.84. Table III-4 shows that Patterson's population percentage of Married Couple w/Children category is larger than the county's total, 34.5% to 31.3%.

These figures can be used to project county provided service impacts. Because of this young family emphasis, certain county departments will be impacted more greatly than others. This data indicates that Patterson's population is made up of many commuters with children. Commuters use gasoline dispensers and families need grocery stores with scales, both of which mean increased workload for this offices's Weights and Measures Division. It is estimated that for every 75 people, a commercial weighing or measuring device is placed into service. Inspection of these devices is mandated by state law and is carried out by county personnel. Another department likely to be impacted is Animal Control because of the large number of children, which means that the number of pets could be relatively large in relation to the county as a whole. Analysis of Patterson's population makeup should be made in order to estimate the impact upon county departments and thus propose acceptable mitigation measures.

Page VIII-4 The impact of growers using water wells in lieu of U.S. Bureau of Reclamation water during the drought is dicussed on this page. This use of ground water is credited with lowering the water table. Again, because the City proposes to use ground water as its principal domestic source, the impact upon the water table will be more detrimental than that caused by agriculture. This is due to the fact that growers supplement groundwater with canal water. This fact reduces the demand on the water table thus allowing it to better recharge the aquifer. However, the urban population will not have this supplement and so all domestic water will come from wells, thus placing tremendous pressure on the aquifer.

Page VIII-5 The last paragraph under "Agricultural Soils and Resources" discusses how agricultural industries account for 16% of the City's employment, with the three largest non-manufacturing firms in Patterson being agriculturally related. Considering the importance of agricultural jobs to Patterson's economy, this single paragraph does not appear to adequately address how agriculture impacts the City and how the loss of agricultural land will impact these agriculturally related businesses. Loss of the surrounding agricultural production land could result in a loss of jobs in these businesses due to decreased product. The ultimate result could be the total loss of these businesses and their positive economic impact on Patterson.

PLANNING COMMISSION COMMENTS ON  
THE DRAFT ENVIRONMENTAL IMPACT REPORT

AMENDED - JULY 9, 1991

1. The General Plan Policy Document contains three alternative land use schemes: 1) Build-out of Entire Planning Area, 2) the East-West Alignment, 3) the Compact Core Area. In a comparison of these three alternatives, what is the relative mitigation of impacts offered by each, both generally and specifically in terms of prime agricultural land? Which alternatives most/least impact loss of prime agricultural lands?
2. Provide a comparison of the growth-inducing impacts generated by the three alternative growth plans.
3. If Las Palmas Avenue is widened to four lanes as recommended, what is the potential traffic impact on the Plaza Circle, its connecting streets, and the surrounding historical district?
4. The General Plan Policy Document restricts the target population of Patterson to 21,000 in the year 2010. The EIR, on the other hand, uses buildout assumptions that result in a population of 26,700. Why is there a discrepancy between the EIR and General Plan population targets? Consistency should run through the two documents.
5. Address the letter (F-15) submitted by Mr. Steve Erickson of the Stanislaus County Department of Public Works, which notes the "need to determine and address whether the Public Facilities Fees Programed Projects in the area adequately address the traffic impact from this General Plan expansion."
6. If the City of Patterson grows to the west and full build-out of planning area what is the financial impact to its existing residents for increasing the necessary sewage capacity?
7. How will the Southern By-pass be financed?
8. How will the changes required at the Interstate 5 interchange be financed?



9. As an impact, the jobs/housing formula may need to be specified and quantified. How will it effect other impacts (eg. reduced commercial and job opportunities as a result of air quality deterioration). What is its growth-inducing impact?
10. Wherever impacts are identified, specifics, especially as regards solutions, should be included. Specifically, subjects which require further clarification of mitigation measures are: 1) drainage, 2) traffic, 3) water, 4) prime agricultural land.
11. The EIR needs to more specifically identify the impacts that will be created by growth and to hold more complete discussions relative to mitigation measures. Issues that require these measures include but are not limited to schools, fire, police, etc...
12. What are the regional impacts the implementation of this General Plan would have?
13. The Planning Commission recommended Land Use Diagram mitigates against loss of prime agricultural land which will occur to a greater extent if the Draft General Plan is adopted.



## APPENDIX G

### RESPONSE TO DRAFT EIR COMMENTS

The following list identifies the written comments received on the *Draft General Plan EIR* (included as Appendix F). Each comment is summarized and a response given.

Date	Agency/Individual
5/10/91	Kenneth Tyler, 1537 Orange Avenue, Patterson
5/11/91	Claude Delphia, 425 H Street, Patterson
5/24/91	Department of Fish and Game, Region 4 (George D. Nokes) 1234 Shaw Avenue, Fresno 93710
6/3/91	Kenni G. Friedman, Stanislaus County LAFCO Commissioner 508 Andover Lane, Modesto 95350
6/13/91	Fran Sutton-Berardi, Senior Planner to LAFCO 1100 H Street, Modesto 95354
6/13/91	Department of the Navy, NALF Crows Landing, 95313
6/19/91	Stanislaus Area Association of Governments (Dennis Brighton) 1315 I Street, Modesto 96354-0913
6/18/91	Public Utilities Commission, Railroad Safety Branch (Tack S. Joe) 505 Van Ness Avenue, San Francisco, 94102-3298
6/24/91	Claude Delphia (second comment), 425 H Street, Patterson
6/24/91	Stanislaus County Department of Environmental Resources Air Pollution Control District (David Jones) 1716 Morgan Road, Modesto 95351
6/24/91	Compliance acknowledgement from OPR
6/19/91	Department of Transportation (Al Johnson, IGR Coordinator) P.O. Box 2048, Stockton 95201
5/22/91	Department of Water Resources (Everett Astleford)
6/25/91	Department of Food and Agriculture (Mary McNally, Graduate Student Assistant) 1220 N Street, Sacramento 95814-0001
7/5/91	Stanislaus County Department of Agriculture (Keith Mahan) Department of Weights and Measures 725 County Center III Court, Modesto 95355
7/9/91	Patterson Planning Commission comments



Kenneth Tyler  
1537 Orange Avenue  
Patterson, CA 95363

No date on letter  
Received 5/10/91

### Letter Summary

Mr. Tyler raises several points in his letter, as summarized below:

1. DEIR should quantify regional cumulative impacts of traffic, water, agricultural land conversion, and air pollution
2. DEIR states that the plan has unmitigatable impacts on the conversion of agricultural lands and on air quality but includes no substantial efforts to mitigate either impact.
3. DEIR should consider as an alternative County development along Sperry Avenue corridor/I-5 interchange rather than such development in the city of Patterson
4. DEIR should consider as an alternative including only enough land to accommodate population of 21,000.
5. Under existing air quality regulations, residential development with associated automobile emissions may preclude industrial development in Patterson.
6. Impact on proposed growth on existing city is not addressed in the DEIR. The ability of new development to address existing infrastructure deficiencies and to finance infrastructure has not been established.
7. Ability of City to acquire surface water has not been addressed adequately in DEIR.
8. DEIR is not legally adequate document. If not corrected, LAFCO should act as lead agency rather than City of Patterson.

### EIR Response

The following are responses by number to the items summarized above:

1. Projects proposed in the region are discussed in the *General Plan Background Report*. Cumulative impacts are discussed in Chapter IX, Section F.
2. The *EIR* identifies impacts on agricultural land and air pollution as significant impacts because no feasible mitigation measures have been identified other than designating the land for agricultural uses or prohibiting further development.
3. The *Planning Area* incorporates land at the Sperry Avenue/I-5 interchange, therefore it is assumed that development would ultimately be annexed to the city. Development under County jurisdiction, however, would have fundamentally the same impacts.

4. The *EIR* includes evaluation of such an alternative (Page IX-4).
5. Since current regulations apply only to point sources and not area sources, residential development would not directly displace industrial development. This effect could conceivably occur if air quality degradation due to residential development results in the APCD limiting new industry to smaller incremental increases in emissions. Overall industrial growth could eventually be curtailed.

A better balance of commercial and industrial development to housing development, however, could reduce vehicle emissions. Most residents drive to Modesto, Turlock, or other cities for major retail shopping. Development of more commercial opportunities would reduce this vehicle travel and associated emissions. In addition, since many existing residents commute to jobs outside Patterson and Stanislaus County, a better balance between industry and housing in Patterson could provide local jobs for Patterson residents and reduce vehicle emissions from long-distance commuting. The policies under Goal VI.D. in the *General Plan Policy Document* also address the air quality implications of new development.

6. Impacts were addressed on the Planning Area-wide basis, including the existing city limits. Economic and social impacts are not considered significant impacts for the purposes of CEQA; financial information will be addressed in infrastructure master plans and financing analysis.
7. Groundwater supplies are adequate to meet the increase in water demand associated with the *General Plan*. A surface water supply is being sought as supplemental source of supply. The absence of a surface water supply does not preclude the ability to meet an increase in water demand.
8. City staff and consultants believe the *EIR* to be a legally adequate document and the City of Patterson is the appropriate lead agency.

## Letter Summary

Mr. Delphia raised numerous issues by category:

1. DEIR did not fully address impacts of widening East Las Palmas Avenue to four lanes:
  - Impact on existing homes that front on East Las Palmas
  - Ability of school bus safety to turn at East Las Palmas at Hartley
  - Impacts on historic palm trees
  - Impacts on safety at Patterson Frozen Foods
  - Impacts on businesses from First Street to Weber Avenue
  - Impacts on bicycle lanes
2. DEIR did not fully address impacts of widening Sperry Avenue east of Ward Avenue to four lanes
  - Sperry Avenue existing right-of-way is inadequate to accommodate four lanes
  - Impact on existing homes that front on Sperry Avenue
  - Impacts on bicycle lanes
  - Impacts on businesses located between Del Puerto Avenue and Highway 33
  - Financing of Sperry Avenue/Highway 33 interchange improvements
  - Financing of Sperry Avenue/I-5 interchange improvements
3. Salado Avenue extension - how would it take place, what affect would it have on existing properties.
4. A roadway is shown near Salado Creek west of Ward Avenue. What impact will roadway have on Salado Creek and existing residents in the area? How can road be financed with reserve land on one side?
5. Bypass
  - Consistency between population growth assumptions in the transportation section of the *Draft EIR* and population limits in the *Policy Document*.
  - How will financing of bypass be accomplished?
  - What is impact of existing homes from development of bypass?
  - Is bypass growth-inducing?
6. What will impacts of traffic be on plaza circle? Mr. Delphia suggests that the circle may need to accommodate through-traffic as a result of the Las Palmas extension.
7. Mr. Delphia recommends alternate routes to serve proposed new commercial areas from the east, such as extension of Orange Avenue.
8. Mr. Delphia recommends direct alignment of M Street and Walnut Avenue across Highway 33 and the railroad tracks.
9. Mr. Delphia questions whether 9th Street is appropriately designated as a collector.



10. Mr. Delphia raises many issues of seismic safety, including the potential for seismic activity along currently unknown faults, as occurred in Coalinga, and hazards associated with failure of the California Aqueduct and bridges over the canals.
11. Mr. Delphia expresses concern over the adequacy of the buildout calculations concerning infill potential in Area R. He also raises concerns of population limits stated in the plan and the holding capacity of the *Land Use Diagram* without related implementation programs to control growth. Questions why part of Subarea L which is within the city's current sphere of influence is not included in some of the alternatives.
12. Suggests further quantification of displaced population.
13. Mr. Delphia expresses concern that new residential development is intended to accommodate new residents, primarily from the San Francisco Bay Area, rather than existing residents, and that this is not stated in the *Draft EIR*.
14. Mr. Delphia suggests a map of the floodplain areas be included in the *EIR* rather than in the *Background Report*. He also questions whether any mitigations should be addressed from potential flooding from the Del Puerto floodplain.
15. Concern over location of community park west of Salado Creek and lack of more neighborhood parks in existing developed areas.
16. Mr. Delphia questions how expansion of the high school will occur.
17. Mr. Delphia questions the alternative showing Ward Avenue with its current alignment.
18. Mr. Delphia expresses concern over size of commercial blocks in expanded downtown area.
19. Questions impact on rezoning downtown based on DR designation.
20. Concern over Estate Residential designation's compatibility with adjacent land use.
21. Mr. Delphia suggests that urban development could take place outside the Planning Area based on city/county agreements.
22. Mr. Delphia requests clarifications to the map of the Planning Area.
23. Mr. Delphia suggests that it is not appropriate to use multiple documents for the *General Plan* and *EIR*.
24. Mr. Delphia suggests addition of discussion of jobs-housing balance.
25. Address regional impacts.
26. Mr. Delphia expresses concern over costs to existing residents of using treated water. In addition, Mr. Delphia questions the studies and feasibility of converting irrigation water for municipal use.

27. Concern of infrastructure improvement costs and relative financial implications of land use alternatives, and economic impacts on existing residents.
28. Mr. Delphia expresses that generally, infrastructure costs are not adequately addressed in the *Draft EIR*.

### EIR Response

There are several statements throughout the Mr. Delphia's comments to the effect that impacts on specific items are not included in the analysis. CEQA Guidelines state that the degree of specificity required in an EIR should correspond to the degree of specificity involved in the underlying activity described in the EIR. An EIR on a construction project will necessarily be more detailed into the specific effects of the project than will be an EIR on the adoption of local general plan or comprehensive ordinance because the effects of the construction can be predicted with accuracy. For the *Patterson General Plan* which is the project for this *EIR*, there are aspects of the project that cannot be evaluated in detail at this time. Precise design of many of the implementation measures will require detailed engineering studies at the time of implementation. When actual construction projects are proposed for implementation, if there are issues which need to be addressed further, the City will require subsequent project EIRs to address those issues.

1. Regarding East Las Palmas, the *EIR*'s recommendation for four lanes on East Las Palmas is not a recommendation for widening, but a recommendation to operate this roadway as a four lane street with the 52-foot pavement width already found along the improved portions. No impact on abutting properties or the existing palm trees would result from this recommendation. This mode of operation would provide two travel lanes in each direction, but the available width will not allow the provision of left turn lanes. Left turns will have to be made from the inside travel lanes. This will operate satisfactorily, as long as the left-turning volumes do not become excessive. The outside lane in each direction will allow through vehicles to safely bypass left-turning vehicles in the inside lane. This is the recommended ultimate mode of operation. On an interim basis, one travel lane in each direction plus a center left turn lane may be provided.
2. Regarding Sperry Avenue east of Ward, it is expected that any right-of-way needed will be purchased or acquired through dedication as development or redevelopment of fronting properties occurs. Various design features can be used to minimize the right of way required, such as narrowing lane widths and sidewalks somewhat.

With adequate right of way acquisition, bike lanes can still be provided. As volumes increase it may be desirable to relocate bike lanes to collector streets.

The Sperry/Route 33 intersection is proposed as a conventional at-grade intersection - an interchange will not be needed. Costs for improvements such as signalization and channelization should be included in a citywide development fee program.

Other significant impacts will need to be addressed at the time a specific widening project is proposed.

Regarding Sperry Avenue, west, three possibilities already exist for funding the interchange and main line improvements at the Sperry/I-5 interchange. One is the Stanislaus County Public Facilities Fees (PFF) program, which is now in effect. The results of the *EIR* may be used to support the inclusion



of some or all of these improvements in the PFF program. A second is the inclusion of a portion or all of these improvement is a proposed City of Patterson Capital Facilities Fees program. A third is the funding program to be developed for the Regional Expressway System proposed by SAAG. This may include a regional sales tax, in addition to other existing and anticipated regional funding sources.

3. Regarding Salado Avenue extension, the extension of this street is a long-term measure. The various options and the respective impacts will need to be further identified and studied when an actual construction project is proposed. It is not unusual for buildings to be acquired, move, or developed in the course of time when such alignment needs are identified in a *General Plan*. Often the develop or redevelop of the site finds it is his/her economic interest to facilitate, if not implement, the new alignment.
4. Regarding Salado Creek street, streets shown on the *Circulation Plan Diagram* are only diagrammatic in their location. Specific alignments need to be determine when specific development plans are considered. Specific impacts will be addressed at that time. Financing and dedication of the roadway could take place as that area develops; the area shown as Residential Reserve in the *Draft General Plan* was changed to Low Density Residential in the *Final Plan*.
5. Regarding the bypass, the discussion was only presented in the *Draft EIR* for the purpose of identifying the probable time frame within which improvements would be needed. It assumed a straight-line growth patterns, and is not an assumption upon which other analysis in the *EIR* is based. This discussion was eliminated from the *Draft Final EIR* as it had no bearing on the impact analysis.

Financing of the bypass will be a local and regional responsibility. It is addressed in the *Regional Expressway Study* prepared by SAAG.

Specific impacts will need to be addressed when specific construction projects are considered.

6. Regarding impacts on the Circle, a major focus of the *General Plan* is the preservation of the character and viability of the existing downtown area. The *Circulation Plan Diagram* provideS adequate additional routes to minimize adverse future impacts on the Plaza Circle. Consequently, the Circle is not projected to be a major route between Highway 33 and future land uses along West Las Palmas.
7. The extension of Orange Avenue to Highway 33 would require an additional at-grade railroad crossing. Experience of other communities in obtaining crossings indicates that new crossings are almost never obtained, without the closure of an existing crossing. Crossings have to be approved by the Public Utilities Commission, and usually require the concurrence of the railroad involved. It is unlikely that a new crossing could be obtained for the extension of Orange.

Orange now connects to Sperry Avenue via First Street. A realignment of Orange could provide a direct connection to Sperry at Highway 33. Such a connection appears to be feasible. A pair of 560 foot radius reversing curves joined by a 200 foot tangent could be used to make the connection. This would provide a 35 mph design speed form Highway 33 to the present Orange alignment just west of the Lateral D canal crossing.



The alignment of this connection would cut through three existing parcels which were either undeveloped or underdeveloped at this time. This severing of parcels and the question of how First Street would connect to this new alignment are issues which would need to be resolved at the specific planning stage of development in this area.

8. Comment noted. Realignment of M Street between Highway 33 and First Street is recommended, especially with the inclusion of the area north of Walnut for residential development within the time frame of the *General Plan*. The *Circulation Plan Diagram* indicates this alignment.
9. Comment noted. This appears to be an oversight in the drafting of the *Draft Circulation Plan Diagram* map and was corrected in the final plan.
10. Within the Diablo Mountain Range, the most recent movements along this fault were approximately five million years ago, although earthquake activity without surface fracturing or faulting is still common. Active seismicity has been identified along some segments of the fault zone. A Richter magnitude 5 earthquake in 1926, a magnitude 3.7 in 1981, and smaller earthquakes monitored from 1969 to 1980 occurred in the vicinity of this fault zone. According to a report produced by the California Division of Mines and Geology at the end of 1991, the Tesla-Ortogonalita fault zone was determined to have no known damaging earthquakes. The fault zone is considered capable of generating earthquakes of Richter magnitude 6.5 to 6.75. The recurrence of earthquakes resulting in surface rupture is on the order of 5,000 to 10,000 years for the entire fault zone.

An Alquist-Priolo Special Studies Zone is located along the Ortogonalita Fault in the Diablo Range and extends into Stanislaus County about seven miles at its southwest edge, however, "sufficient evidence of recent fault rupture on this segment has not been identified to warrant zoning under the Alquist-Priolo Act." The lower portion of the fault range, the Tesla Fault, has been interpreted as being a remnant of an older, inactive fault system.

As demonstrated by the Coalinga earthquake, earthquakes can occur along faults not known prior to the incidence of the earthquake. Since the *General Plan*, however, cannot foresee unknown circumstances, the *General Plan* relies on available fault information.

11. Revised buildout calculations are shown in Appendix D. The portion of Subarea L within the city's existing sphere of influence was added to the *Land Use Diagram*.
12. Displaced population refers to housing units in nonresidential land use designations that are assumed to be removed through market activity and replaced by nonresidential development at buildout of the *General Plan*. The number of housing units assumed to be removed in each subarea is discussed in Appendix C.
13. The demographic discussion of recent growth in Patterson as a result of commuters to the San Francisco Bay Area is discussed at length in the *Background Report*. Traffic and air quality analyses were also made based on this trend. Affordable housing, however, will be developed for existing city and county residents, as indicated in Policy II.A.22.
14. The 100-Year Floodplain map contained in the *Background Report* is now included in the *EIR* as Figure VIII-1.

Flooding from Del Puerto Creek is difficult to address. Any improvement to address it will require extensive improvement along Del Puerto Creek. Providing localized protection may involve diking or retention ponds. However, this will only shift the flooding problem to other areas.

New development under the *General Plan* will not significantly increase the likelihood of major flooding from Del Puerto Creek but will subject additional people and property to be exposed to this potential hazard. Proper building design including minimum floor elevation will minimize the damages to properties due to flooding.

15. The parkland map is only intended as an indication of where and how many parks might be developed based on *General Plan* park standards. Locations of all parks will be determined based on the *Parks and Recreation Master Plan* (Policy V.A.1). The existing developed city does have a park deficit. For the purposes of Figure VI-1, it was not assumed that existing development would be replaced with park land. This issue can be addressed in the *Parks and Recreation Master Plan*. Due to an increase in density in the Poppy Avenue area, a park in that area is now shown in Figure VI-1.
16. The high school expansion will take place on the existing high school and junior high school property, per the Patterson Unified School District's current plans.
17. The *Draft Final EIR* does not include this as an alternative as the City Council selected the alternative which included the abandonment of Ward Avenue between 9th and M Streets.
18. The blocks are two to four acres in size, large enough to accommodate retail shops and offices, consistent with that in the existing downtown. There are also larger parcels to accommodate shopping centers in this area.
19. The *General Plan* includes an implementation program to revise the *Zoning Ordinance*. In addition, the majority of the existing zoning would be consistent with the DR designation, as the DR specifies a maximum density, which means that the underlying zone could not exceed that intensity, but could remain at a lower density.
20. All of the Estate Residential designation was redesignated Low Density Residential in the *Final General Plan*.
21. Policies in the *General Plan* indicate that only land within the Planning Area is proposed for urban development within the time frame of the *General Plan*. Public facility planning was only completed for land within the Planning Area.
22. The Planning Area was revised and all corrections made.
23. The *EIR* clearly states the function of the three documents, *Background Report*, *Policy Document* and *EIR*, and their role (page I-2). Use of three documents avoids duplication of materials.
24. A discussion of jobs-housing balance is included in Chapter III, page III-6.
25. See item 1 in response to Kenneth Tyler.

26. Policy IV.A.8 states that new development will pay its share of the costs of water system improvements. Water from the Delta-Mendota Canal is currently being used in other communities as a municipal water supply.
27. Economic and social effects are not considered significant impacts for the purposes of CEQA. These items will be addressed in infrastructure master plans and financing plans.
28. See item 27.



George D. Nokes  
Regional Manager  
Department of Fish and Game, Region 4  
1234 East Shaw Avenue  
Fresno, CA 93710

Letter dated 5/24/91

### Letter Summary

Mr. Nokes states that the Department of Fish and Game believes that the Draft General Plan will involve elimination or destruction of some habitat, and is subject to environmental review fees to the department.

### EIR Response

The *EIR* acknowledges that growth under the *General Plan* would cause destruction of agricultural lands used as foraging habitat by the Swainson's hawk, a state-listed endangered species, and the *Policy Document* includes mitigation measures typically required by the Department of Fish and Game.

Certain issues have arisen concerning the use of agricultural lands by the San Joaquin kit fox since the *Draft EIR* was published. A discussion was added to the *Background Report* and the *Draft Final EIR*. In the past, the uncultivated annual grasslands were assumed to be the only viable kit fox habitat in the region. Kit foxes, in several recent cases, however, have been observed inhabiting some types of agricultural land. Policy VI.C.2, which commits the City to support state and federal laws and policies to preserve populations of rare threatened, and endangered species, and to mitigating adverse impacts to these species, should avoid significant impacts to the San Joaquin kit fox.

The letter also addresses fees for environmental review and not the adequacy of the EIR.

Kenni G. Friedman  
Stanislaus County LAFCO Commissioner  
508 Andover Lane  
Modesto, CA 95350

Letter dated 6/3/91

### Letter Summary

Ms. Friedman made the following points:

1. Greater consideration should be given to attracting industrial and commercial developments to employ Patterson residents as an air quality mitigation.
2. The City should consider the "Compact Core Area" alternative since it has fewer impacts.
3. Three points raised by Ron Freitas, LAFCO Executive Director, in his November 8th letter were not adequately addressed in the DEIR.

The three points in Mr. Freitas' letter are as follows:

- Concern over the impacts of land extending south to the Delta-Mendota creating an isolated pocket of farmland
- Expansion of sphere of influence under LAFCO
- Concern over the cancellation of Williamson Act contracts

### EIR Response

1. The *General Plan* includes many goals and policies to encourage additional commercial and industrial development (See policies under Goal I.C and I.E.) and includes land designated for commercial and industrial development to accommodate such growth.
2. The City revised the *Land Use Diagram*, but rejected the "Compact Core Alternative" as not meeting its goals for the economic viability of the city.
3. The land in question was removed from the *General Plan*. The *EIR* identifies possible nonrenewal and cancellation of Williamson Act lands as significant impacts. Sphere of influence expansion and LAFCO policies are discussed in the *Draft Final EIR* (page III-2).

Fran Sutton-Berardi  
Senior Planner to LAFCO  
Stanislaus County  
1100 H Street  
Modesto, CA 95354

Letter dated 6/3/91

### Letter Summary

Ms. Sutton-Berardi raises several points:

1. Discussion of why the Compact Core Alternative was rejected in favor of the *Draft General Plan* should be included.
2. Three points raised by Ron Freitas, LAFCO Executive Director, in his November 8th letter were not adequately addressed in the DEIR.
3. Greater discussion of Salado Creek flooding should be included.
4. What is the justification for rapid expansion of the city, and how population growth will be slowed down.
5. What composition of housing types will be included in new development?
6. All policies should include the word "shall" rather than "should" to be true mitigation measures. Ms. Sutton-Berardi specifically references policies recommended for mitigation of Swainson Hawk habitat.
7. Discrepancies in figures in Tables II-5 and III-1.

### EIR Response

1. See item 2 in response to Kenni Friedman, LAFCO.
2. See item 3 in comment from Kenni G. Friedman, LAFCO.
3. The discussion of Salado Creek flooding has been expanded in the *Draft Final EIR* (see Chapter V, in "Drainage" section and Chapter VIII, "Flooding" section). In addition, the City has prepared a *Drainage Master Plan* to address this issue.
4. Policy I.A.2 and Program I.5 will guide the population growth under the *General Plan*, as follows:  
  
Policy I.A.2. Growth in Patterson shall be planned and guided consistent with the following population limits and land use principles:
  - Population limit of 17,000 residents by the end the seventh year.
  - Population limit of 19,000 residents by the end of the fifteenth year.
  - Population limit of 21,000 residents by the end of the twentieth year.



- Concentrate community commercial, high-density residential, and public facilities uses in the downtown area and its western extension.
- Emphasize a mixture of residential types and densities.
- Ensure that ample buffers are established between incompatible land uses.
- Provide for an orderly sequence of development based on the logical extension of public facilities and services. Projects which extend such facilities and services shall be given priority in the allocation of growth, consistent with the target population levels set forth above, and shall be afforded such assurances (e.g., development agreements) as may be necessary to ensure that future facilities and service are adequate and properly extended.

Program I.5. The City shall monitor the city's population growth on an annual basis and shall institute a growth management program if necessary to ensure that the city does not exceed the population limits set forth in Policy I.A.2

5. The composition of housing among residential land uses is described in Chapter II. Furthermore, Policy II.A.4 requires projects of 10 or more units to include five percent low- and five percent moderate-income housing in new housing developments, or pay equivalent in-lieu fees.
6. Those policies specifically referenced were incorporated into the *General Plan* and were changed to "shall".
7. The table discrepancies were corrected.

W. A. Carpenter  
Lieutenant Commander  
Department of the Navy  
Naval Auxiliary Landing Field  
Crows Landing, CA 95313

Letter dated 6/13/91

### **Letter Summary**

Lieutenant Commander Carpenter reflects appreciation of inclusion of the Air Installation Compatible Use Zone in the DEIR, and expresses the desire for continued cooperation between the City of Patterson and Crows Landing NALF.

### **EIR Response**

Comments noted. No EIR response necessary.

Dennis Brighton  
Associate Planner  
Stanislaus Area Association of Governments  
1315 I Street  
Modesto, CA 95354-0913

Letter dated June 19, 1991

### Letter Summary

Mr. Brighton makes three points in his letter:

1. The *Draft General Plan* should increase its target numbers for very-low-income households to be consistent with SAAG's *Housing Need Report*.
2. The City should send a copy of the *Draft General Plan Background Report* to the California Department of Housing and Community Development (HCD) to assist in their review of the *Housing Element*.
3. Suggest that the issues and policies in the transportation chapter of the *Draft EIR* be included in the *Background Report*.

### EIR Response

1. The City has modified its targets for very-low-income households (See page II-18, *Policy Document*).
2. The City did send a copy of the *Draft General Plan Background Report* and *Policy Document* for HCD's review.
3. The *Background Report* is intended to provide background on existing conditions in Patterson. The *Issues and Options Report* and *Policy Document* discussed policy issues at length.



Tack S. Joe, Transportation Engineer  
Special Projects Section, Railroad Safety Branch  
Safety Division  
Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

Letter dated June 18, 1991

### Letter Summary

Mr. Joe writes concerning possible future traffic impediments and noise impacts which might result from the rail line that bisects Patterson, recommending that the City consider at least one future separation of grades between vehicular and train traffic.

Mr. Joe also suggests that the report should address the noise impacts caused by operation of trains, both by day and by night.

### Response

Consideration was given to the fact that the Southern Pacific Railroad runs through Patterson. The *Background Report* (Chapter IV) describes the existing train operations and identifies the tracks as a barrier to orderly and efficient development of the local circulation system.

The *EIR* recognizes that a grade separation between the southern bypass expressway and Highway 33/Southern Pacific Railroad is a desirable possibility if funding becomes available. Reference is made in the *EIR* and in the *SAAG Regional Expressway Study* which shows a possible future expressway interchange at this location, if it does not prove infeasible due to land use or costs. The *Policy Document* includes a policy to investigate a grade separation in future studies for constructing the expressway (Policy III.A.5).

Noise contours for existing rail traffic are addressed in the *General Plan Background Report* (Chapter IX, Noise section).

Claude Delphia  
425 H Street  
Patterson, CA 95363

Letter dated June 24, 1991

### Letter Summary

Mr. Delphia makes numerous points concerning the *Draft EIR* and *Draft Background Report*.

1. Concerns over legality of opening and closing public hearings on *Draft EIR* when revision to the *Draft Background Report* were not available.
2. Concerns that updated information concerning the financial impacts of the *Draft General Plan* were not available during the public comment period.
3. Challenges the use of policy statements as mitigation measures.
4. Concerning the annexation history in the *Draft Background Report*, believes information on annexation dates should be available.
5. Mr. Delphia suggest corrections to Figure I-5, Figure I-6, Figure I-7, and Figure I-8 of the *Draft Background Report*.
6. Table I-5 of the *Draft Background Report* does not include Newman's expansion.
7. Mr. Delphia is concerned with errors in the Background Report.
8. Mr. Delphia suggests that the first finding in the Background Report is incorrect and points out that the real estate market has taken a downturn.
9. Mr. Delphia questions whether Patterson has more overcrowding than other cities, and raises questions over the housing data used throughout the report.
10. Mr. Delphia suggests numerous minor corrections in *Background Report* figures.
11. Mr. Delphia suggests that the air pollution discussion reference air quality deterioration resulting from new housing development.
12. Mr. Delphia raises issues of seismic safety raised in his letter of May 14, 1991.
13. Mr. Delphia questions adequacy of Salado Creek information in *Background Report*, and suggests that many areas of localized flooding are not indicated on the map.
14. *DEIR* does not address financial impacts of growth.

## EIR Response

1. The public comment period on the *Draft EIR* was available from May through June, 1991, and public hearings on the *Draft EIR* were held in May before the Planning Commission and from August through October before the City Council, after the revised *Draft Background Report* had been available for several months.
2. Section 15131 (a) of the *Government Code* addresses "[E]conomic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.
3. Policies of the *General Plan* are included to apply to future development under the General Plan in order to mitigate potentially adverse impacts. Future development in the city must be consistent with the policies of the *General Plan*.
4. Corrections to this table were made.
5. Corrections to these figures were made.
6. At the time of the *Draft Background Report's* publication, the Newman City Council had not reached any decisions concerning the amount of future growth to be accommodated in their general plan update. Table I-5 in Chapter I of the *Background Report* now references Newman's potential expansion.
7. Most of the corrections to the *Background Report* address items that needed to be updated from the original baseline date (1988) to 1990 or are minor errors. The Consultants and City staff thoroughly reviewed all relevant information for use in general plan reports.
8. The *Background Report* was updated to discuss the cyclical nature of the real estate industry.
9. The *Background Report* relied primarily on 1980 Census data when prepared as that was the most recent data available. Updated statistics were used when possible. 1990 Census data has been incorporated into the revised *Background Report*.
10. Suggested corrections to the figures were made.
11. The effects of residential development are discussed generally in Chapter VII under "Effects on Regional Air Quality." The specific information on modelled pollutant contributions by residential development is included in Table VIII-4. Because of the manner in which the air quality model processes data and the nature of the analysis undertaken for the *General Plan*, the inclusion of residential development is implicit in all discussions regarding the overall development which could occur under the *General Plan*.
12. See response to Delphia letter dated May 14, 1991.



13. The source of the 100-Year Floodplain map contained in the *Background Report* is the Federal Emergency Management Administration. It was developed for the purpose of its Flood Insurance Program. It does not necessary represent all the localized flooding areas in the vicinity of Patterson. This map was the most comprehensive information available at the time the *Background Report* was prepared.

A drainage study commissioned by the City has just been completed to determine the extent of the flooding problem in Patterson, and concluded that the flooding problem is widely spread in the area. A comprehensive drainage system has also been developed as part of the drainage study to address the flooding problem.

14. See item 27 in response to Delphia letter dated May 13, 1991.

David L. Jones  
Air Pollution Specialist  
Stanislaus County Department of Environmental Resources  
Air Pollution Control District  
1716 Morgan Road  
Modesto, CA 95351

Letter dated June 24, 1991

### Letter Summary

The APCD agrees with the assessment in the *Draft EIR* that development under the plan will have a significant impact on regional air quality. The APCD requested that all references to the Stanislaus County APCD be changed to the San Joaquin Valley Unified Air Pollution Control District to reflect the organizational change.

The APCD also made several recommendations:

1. Add policy to encourage pedestrian and bicycle access to be direct as possible and not circuitous.
2. Add implementation program for City planning staff to review specific projects to ensure adequate pedestrian and bicycle access has been provided.
3. Add implementation program to include mechanism to guarantee that Non-Motorized Funds of the Transportation development Act are actually used for pedestrian and bicycle projects.
4. Expand Policy VI.D.2 to include statement of cooperation with the APCD in Clean Air Act programs.

### Response

All references to the Stanislaus County APCD have been changed as requested. Language reflecting the APCD's first recommendation (No. 1 above) was added to the *Policy Document* by the City Council (Policy III.G.2).

Policies III.G.1 and III.G.2 commit the City to maintain a safe and convenient system of pedestrian and bicycle pathways designed to connect residential areas with recreation, shopping, and employment areas. The policies also include provisions for designing these routes to be as short as possible. The City feels that these policies fulfill the intent of the comment.

David C. Nunenkamp  
Deputy Director, Permit Assistance  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

Letter dated June 24, 1991

### **Letter Summary**

Letter acknowledges receipt of *Draft EIR* and has submitted it to appropriate state agencies for review.

### **EIR Response**

Letter noted. No EIR response is necessary.



Al Johnson  
IGR Coordinator  
Department of Transportation  
P.O. Box 2048  
Stockton, CA 95201

Letter dated June 19, 1991

### **Letter Summary**

Development under the *Draft General Plan* will have major impacts on the Sperry Road/I-5 interchange and will add traffic to I-5. Plan must include a mechanism for staging improvements to the interchange, participation for funding by developers for interchange improvements and mitigation funding for I-5 improvements.

### **Response**

Three possibilities already exist for funding the interchange and main line improvements at the Sperry/I-5 interchange. One is the Stanislaus County Public Facilities Fees (PFF) program which is now in effect. The results of the *EIR* may be used to support the inclusion of some or all of these improvements in the PFF program. A second is the inclusion of a portion or all of these improvements in a proposed City of Patterson Capital Facilities Fees program. A third is the funding program to be developed for the Regional Expressway System proposed by SAAG. This may include a regional sales tax, in addition to other existing and anticipated regional funding sources.

Everett Astleford/Nadell Gayou  
Maintenance Engineer, O&M  
Department of Water Resources  
The Resources Agency

Letter dated May 22, 1991

### Letter Summary

Mr. Astleford expresses concern that widening of Sperry Avenue would disrupt the Department of Water Resource's O&M access road via Sperry Avenue, and asks that the Department be permitted to review engineering plans of individual projects near the California Aqueduct.

### Response

Review by affected agencies will be addressed in specific project proposals environmental assessment. No change in the *Draft General Plan* is required.

Mary McNally  
Graduate Student Assistant  
Agricultural Resources Branch  
Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

Letter dated June 5, 1991

## Letter Summary

Ms. McNally raises three points in her letter:

1. Site-specific mitigation measures for the conversion of prime farmland, including phased development, should be discussed in *Final EIR*.
2. Cancellation of Williamson Act contracts should be identified as a significant impact.
3. The *Final EIR* should include a map of prime farmlands around the project area, since the plan will be growth-inducing.

## EIR Response

The *General Plan* identifies the conversion of prime farmland as a significant impact and includes policies to reduce these impacts and minimize the premature conversion of farmland (Policies VI.B.1, VI.B.2). Since the *EIR* is a program EIR and specific development plans have not been developed for the Planning Area, it is not possible to discuss the specific impacts of planned developments. These types of analyses will need to be conducted as specific development plans evolve. Site-specific measures and project phasing will be identified on a project specific basis.

Non-renewal and cancellation of Williamson Act contracts is identified as a significant impact in the *Draft Final EIR*. The EIR has been amended to reflect the comment that cancellation of Williamson Act contracts is a significant adverse impact that cannot be reduced to a less-than-significant level. Text has also been added that recognizes the growth inducing tendency of the *General Plan*, particularly the southern expressway alignment, and its resulting impacts on agricultural lands and lands under Williamson Act contract.

As indicated in the *EIR*, the California Department of Conservation's (CDC) mapping of prime farmland in the western Stanislaus County has not yet been extended to areas west of the San Joaquin River. As a result, prime farmland designations as defined by the CDC are not available. In lieu of this information, these lands have been evaluated using SCS designations. Evaluation against SCS criteria do indicate that most, if not all of the Planning Area, will be classified as prime by the CDC. The *General Plan Background Report* includes a map of prime farmlands throughout the Study Area which encompasses a larger area than included in the *General Plan*. The *General Plan* is growth-inducing in that it allows for growth within the *General Plan* boundaries. No conversion of farmland of land outside these boundaries is anticipated in the time frame of the *General Plan*.



Keith Mahan  
Agricultural Commissioner and Sealer  
Department of Agriculture and Weights and Measures  
725 County Center III Court  
Modesto, CA 95355

Letter dated July 5, 1991

### **Letter Summary**

Mr. Mahan suggests that the City institute a development fee of \$9.25 per unit to address impacts on the Department of Weights and Measures.

### **EIR Response**

The letter did not contain any supporting documentation to indicate how the per unit cost figure was derived, so assumptions concerning the types and rate of growth are unknown. The City does not choose to identify a fee as part of the *General Plan*, judging that these impacts would be better addressed on a countywide basis.

## Letter Summary

The letter made extensive comments on the *Policy Document*, *Draft EIR*, and *Background Report* first addressed the *Policy Document*.

Many of the comments on the *Policy Document* concern the need for city-county cooperation or the need for development in the city of Patterson to address county services. In many instances, the letter expands on how particular policies might be carried out, and recommend consultation with county agencies.

Other specific issues raised in the letter include the following:

1. Concern about the Patterson Airport as an agricultural airport, or allowing recreational uses.
2. Impact of the southern on agricultural operations and concern that the expressway may be growth-inducing.
3. All of the area west of Highway 33 is included in the San Joaquin kit fox range.
4. Concern with policy that the city shall not approve any projects with unmitigatable impacts on rare, threatened or endangered species unless there are significant, overriding considerations.
5. Concern over future groundwater supply and quality. The letter first comments that water wells on the West Side have not generally not experienced chemical contamination. The letter raises concern over recharge when agricultural land is replaced with paved area.
6. Concern over future economic loss from agriculture-related income and employment.
7. Questions assumption that development would reduce PM10 emissions based on Kern County model.
8. Suggests greater analysis of population composition to determine impacts on county departments.

## EIR Response

Concerning the *Policy Document*, cooperation with the county is anticipated and such cooperation is directly mentioned in several policies (I.A.9, I.A.10, I.F.2). County facilities will be considered in future city space needs studies.

1. No change in the airport's operations are anticipated as part of the *General Plan*. Since the airport is an existing operation, any new development in the area will be required to consider safety issues and respect noise contours for the airport.

2. The specific impact of the expressway on farming operations will be analyzed when the specific project is proposed (see response to Delphia letter regarding specificity). The alignment of the southern bypass expressway has been identified in the *EIR* as potentially growth-inducing.
3. In the past, the uncultivated annual grasslands were assumed to be the only viable kit fox habitat in the region. Kit foxes, in several recent cases, however, have been observed inhabiting some types of agricultural land. The discussion in the *Draft Final EIR* was amended to reflect this issue. The City feels that Policy VI.C.2, which commits the City to support state and federal laws and policies to preserve populations of rare threatened, and endangered species, and to mitigating adverse impacts to these species, would avoid significant impacts to the San Joaquin kit fox.
4. This policy references the requirements under CEQA that no project which has a significant adverse impact can be approved unless there are significant overriding considerations.
5. The City has evaluated the adequacy of groundwater supplies to meet the increase in water demand associated with the *General Plan*. This evaluation leads to the conclusion that groundwater supplies are adequate to meet increased water demands.
6. Economic and social effects are addressed in Section 15131(a) of the *State CEQA Guidelines*, as follows:

Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

7. Since the commentor did not identify the report from which the stated figures are taken, the activities that are aggregated into the categories are not known. However, it is clear that the cited data, as well as other studies, find that a major portion of PM10 originate from exposed soil areas which, other than in construction areas, are not typical of urban environments. Exposed soil areas, such as disturbed or otherwise unvegetated agricultural fields and unpaved roads are typical of agricultural areas. It is also reasonable to assume that at least a portion of the paved road dust mentioned in the comment is actually resuspended dust from other origins.

The California Air Resources Board (ARB) estimates that agricultural operations account for a substantial portion of all the PM10 generated in Stanislaus County. Because development under the General Plan would create only temporary soil disturbance during project construction and because conversion of agricultural land would reduce farming operations locally, PM10 emissions within the Planning Area are expected to decline.

8. The population analysis was based on the best available data. It is not reasonable to project the precise composition of future households over the next 20 years. Fees to address impacts on county services should be addressed on a countywide basis.



## Summary

The Planning Commission raised numerous points, as summarized here:

1. More analysis of the alternatives and their impacts, particularly on agricultural lands, should be included. A comparison of the growth-inducing impacts of the alternatives should be included.
2. Concern over potential traffic impacts on the plaza circle, surrounding streets, and surrounding historic district from widening Las Palmas to four lanes.
3. Concern over population limits in policy and *General Plan* buildout population.
4. Respond to Notice of Preparation comment concerning adequacy of County public facility fees to address traffic impacts from development under the *General Plan*.
5. Several questions were raised concerning the financing of sewer and roadway improvements.
6. Specify and quantify jobs-housing ratio, related impacts, and growth-inducing effect.
7. Mitigation measures for impacts should be more specific, in particular for drainage, traffic, water, and agricultural land, and public services.
8. Identify regional impacts.
9. Recommended a revised *Land Use Diagram*.

## EIR Response

1. The impacts on agricultural lands of any of the land use alternatives is directly dependent on the amount of land included within each alternative. Since Patterson is surrounded by prime agricultural land, generally any significant new development will result in the loss of agricultural land. Similarly, each land use alternative is growth-inducing to the extent that it designates land for urban development. The *General Plan*, however, includes policies to limit total population, and therefore the development level, to 21,000 population by 2011.
2. When East Las Palmas is widened to four lanes, the segment between the Plaza Circle and Highway 33 should be restriped for two lanes eastbound and one lane westbound. This may require removal of parking from one or both sides of the street. The segment east of Highway 33 would be widened to four lanes adjacent the highway. This would provide two eastbound lanes leaving the intersection, and a left-turn lane and a combined through or right-turn lane approaching the intersection. The Highway 33/East Las Palmas intersection would be signalized. No physical changes are envisioned to the Plaza Circle or the other streets connecting to the Circle.

The widening of East Las Palmas alone will not adversely impact the Circle of the streets connecting to them. If this improvement was implemented today, the results would be generally improved traffic conditions at the Highway 33/East Las Palmas intersection and vicinity. What will impact the Circle and its connecting streets is the gradual increase in traffic volumes which can be expected to occur as the development occurs. These traffic increases will result in some increased peak hour congestion in the downtown area, but with peak hour conditions still within the range acceptable to the majority of motorists. A secondary effect will be diversion of traffic to other routes (such as El Circulo) to avoid any locations perceived to be congested.

3. The *General Plan* includes more land than is anticipated for development within the 20-year time frame of the plan. The plan includes policies and implementation programs to restrict growth to 21,000 in 2010. See response to item 4 to Fran Sutton-Berardi, LAFCO.
4. The traffic analysis of the *EIR* indicates that the improvements included in the Stanislaus County Public Facilities Fees program for intercity roadways and expressway facilities identified in the SAAG *Regional Expressway Study* should adequately accommodate most of the regional travel demands associated with development under the *General Plan*. If development of all of the industrial land uses in the *Land Use Diagram* occurs, however, the western portion of the Sperry expressway will need to be widened to six lanes, instead of four lanes projected by the SAAG *Regional Expressway Study*.

Within the Planning Area, however, there are traffic mitigation improvements identified by the *EIR* which are candidates for a City of Patterson capital facilities fees program. The City should pursue both the initial adoption of such a program and the regular updating of the program to ensure that the mitigation measures necessitated by new development within the Planning Area are funded. This approach is being pursued or is already used successfully by other cities within Stanislaus County, including Modesto, Ceres, and Turlock.

Also see responses to comments by Al Johnson of Caltrans, June 19, 1991.

5. Economic and social impacts are not considered significant impacts for the purpose of CEQA. (*Government Code* §15131). These issues will be addressed in other documents (e.g., water, sewer, and drainage master plans and financial analysis).
6. A jobs-housing discussion is included in the Housing section in Chapter III of the *Draft Final EIR*.
7. Discussion of these areas was expanded in the *Draft Final EIR*. These items will also be addressed more specifically based on studies to implement the *General Plan*, and master infrastructure plans, and in individual projects.
8. Other projects in the region are described in the *General Plan Background Report*.
9. The *Draft Land Use Diagram* was modified by the City Council, incorporating many of the Planning Commission's recommended revisions.

## APPENDIX H

### DRAFT FINAL EIR COMMENTS

The following list identifies the written comments received on the *Draft Final Plan EIR*. The comments are included in this appendix. Each comment is then summarized and a response given in Appendix J..

Date	Agency/Individual
4/10/92	Claude Delphia, 425 H Street, Patterson
4/3/92	David L. Dolenar, Deputy Administrative Officer, Stanislaus County, P.O. Box 3404, Modesto, CA 95353
3/5/92	Mike McNaughton, President, Patterson Downtown Business Improvement Association, 355 W. Las Palmas Avenue, Patterson, CA 95363
4/1/92	W.A. Carpenter, Lieutenant Commander, U.S. Navy, Naval Auxiliary Landing Field, Crows Landing, CA 95313
3/26/92	Thomas Lynn Avery, Administrator, Del Puerto Hospital, P.O. Box 187, Patterson, CA 95363
3/18/92	Keith H. Daniel, Superintendent, Patterson Unified School District, P.O. Box 547, Patterson, CA 95363
3/13/92	Tom Van Groningen, Chancellor, Yosemite Community College District, P.O. Box 4065, Modesto, CA 95362
4/8/92	David L. Jones, Air Quality Planner, Stanislaus County Department of Environmental Resources, Air Pollution Control District, 1716 Morgan Road, Modesto, CA 95351
3/16/92	Richard G. Gaiser, Fire Chief, City of Patterson
3/30/92	Ron West, Kaufman & Broad, 4701 Sisk Road, Suite 201, Modesto, CA 95356
4/10/92	Governor's Office of Planning and Research, Compliance notice, April 10, 1992
3/9/92	Keith Barrett, Chief, Division of Operations and Maintenance, California Department of Water Resources, March 9, 1992





April 10, 1992

Please include the following comments and rebuttal in the Draft Final EIR dated February 21, 1992.

**New point 1 - Policy as Mitigation.**

Throughout the document, mitigations on impacts are solved by referring to policy. At the LAFCO meeting were the consultant presented, Ron Freitas stated that policies can not be used as mitigation. Throughout the Final EIR, policy continues to be used as mitigation. I believe this is contrary to CEQUA law.

**New point 2 - Splitting projects.**

Throughout the Draft Final EIR's responses to my comments it is stated that Project EIR's will be determine whether an individual project has any impacts which need to be mitigated.

This amounts to a splitting of projects which cumulatively have an impact. I challenge this as being an illegal splitting in order to avoid the real impacts.

**New point 3 - Closure of Ward Avenue.**

Most Cities look for ways to get major cross town routes. Patterson has so far opted to break an existing cross town route by closing one small section of Ward Avenue just in order to maintain a "Grid" pattern.

A quick look at Figure IV-1 which shows projected traffic counts will show that a considerable amount of traffic is going to be directed along North 9th Street (see comments later in the my rebuttal section).

While most other streets in this Figure IV-1 show traffic counts, one of the most critical sections, 9th Street shows none.

Without knowing what this traffic count is, the City Council can not know the impact of the closure of Ward Avenue on 9th Street and it's impact on the High School and surrounding properties.

**New point 4 - Orange Ave./Sperry Connection**

On figure IV-2, Sperry Avenue is shown as making a new connection with Orange Avenue. The new connection is shown as being 4 lanes which then drops down to 2 lanes at Orange and Locust Avenue.

This appears to be a design mistake. If not, then the impact of this dumping of four lanes of traffic on Orange needs to be addressed.

The following are my rebuttal responses on the General Plan Draft Final EIR dated February 21, 1992 to the item which begins on page G-6.

### Traffic

My question about missing traffic standards was not addressed.

The consultants comments about the type of EIR are misleading. There is sufficient "specificity" in this EIR to require that it address many issues left unanswered. The logical purpose of an EIR is to understand the impacts of the decisions made by local governments.

If the details of the proposed decisions are not understood then it becomes too late to address them at a later time when they become "project EIR's. This also bypasses the real purpose of EIR's which is to make clear the real impacts of the General Plan. If the consultant and the elected officials of the City of Patterson see the EIR as just something to get over with, then the residents of Patterson are the losers since the local officials will not be given the impact information with which to understand their decisions.

"Project EIR's are by their very nature, EIR's which are done when a specific project is being planned. At that point a great deal of money will have been wasted if the EIR then shows that the project is no longer feasible for whatever reason.

Developers and property owners need to be able to look at the General Plan and decide where they can develop and how. If they look at the location of a proposed new street and base their plan accordingly, it becomes virtually too late if the City then says: "Well the location of that street really isn't going to work after all. We didn't look at the impacts until you proposed building next to it." The EIR should analyze the impacts now before the overall traffic concepts are set.

All of the traffic decisions are good examples of the inadequacy of Project EIR's.

A case in point:

Suppose that Orange Avenue is improved to collector status in the year 1995. Then in the year 1997 it is determined that East Las Palmas needs to be converted to its 4 lane designation. If the project EIR determines that East Las Palmas can't be converted and Orange Avenue should have been made into an Arterial, it would cost millions to rectify the situation.

The Draft Final EIR should determine the ability of the General Plan to work rather than waiting for the inevitable short falls that will show up later.

It would appear that the concept of this EIR is to respond only to those concerns expressed by others. An impact report should address all the issues. If houses will need to be relocated or property will need to be purchased in order to accomplish a goal, then the impact needs to be stated.



If the Planning Commission and City Council know that houses will have be moved or destroyed as an impact of a General Plan decision, then they need to know it upfront. If they have that information up front perhaps there decision would be different if they are faced with the specific impacts.

**1. Rebuttal to East Las Palmas Avenue response.**

To plan East Las Palmas Avenue without proper turn lanes is a major mistake. Just a few years ago citizens begged for turn lanes before the present lane setup was installed. To presume that their quality of life should then be lowered by eliminating those turn lanes is an error. This impact is not addressed in the Draft Final EIR.

Orange Avenue should be made the Arterial (Map Policy Document Figure I-1)

There are many additional reasons for this.

First off the General Plan should avoid funnelling anymore traffic into the Highway 33/Las Palmas intersection. People should be urged to take Sycamore to Orange and Sperry if they want to go west.

Orange Avenue which is bordered by industrial development and no existing residential development (except single family ranches) is ideal for conversion to an interim 4 lane Arterial especially with the potential to make a direct connection with Sperry Avenue.

The consultants response does not address my comments about the bus turning situation, the businesses from 1st Street to Weber Avenue, the effects of 4 lanes on the historic palm trees.

Furthermore the amount of traffic coming in from West Main needs to be addressed. Can anyone envision Carpenter Road or West Main becoming 4 lanes in the next 20 years? If this will not occur then what is the impact on making East Las Palmas 4 lanes?

**2. Rebuttal to Sperry Avenue between Ward and Highway 33.**

This response presumes that changes will take place in the property uses. You only have to look at all the new development, houses, south of Sperry to see these uses will not change. Between 9th Street and Del Puerto is a residential area on the North Side. Based on similar streets in Modesto - for example: Orangeburg - it is clear that these homes will not change. Therefore their front yards will have to be sacrificed to the proposed Arterial through this section.

Can anyone envision Pacific Tomato Growers giving up any of their frontage for additional lanes?

This is just another example of failure to examine in detail, the impact of this Draft Final EIR.

Addressing the impacts and looking at the feasibilities would suggest that the southern bypass needs to be moved closer to town and be built soon



enough to eliminate the need to convert Sperry between Ward and Highway 33 to four lanes.

Sperry Avenue West of Ward.

The response here does not address the actual costs but only theorizes that the money will come from various funds. The real financial impacts are not addressed.

### **3. Rebuttal to Salado Avenue extension west of Ward.**

Patterson already has one intersection which forms a problem intersection because no one was willing to go through the house that was there. That was over 12 years ago. That intersection is North 1st and Walnut Avenue where it connects with Highway 33.

It is not reasonable to propose a long term plan presuming that the residents will be willing to sellout so that a new street can go through their houses or to presume that the new FDES Hall currently under construction, will be willing to demolish it for some unspecified reimbursement at any time in the next 25 years.

Unfortunately this proposed extension does not jib with reality. That reality is that the Kaufman and Broad piece must include the extension of Salado Avenue west and yet there is no reasonable way to see how this is going to be accomplished. That's why the General Plan EIR should address specific impacts.

This is certainly not a situation where the area will be converted to commercial uses and therefore it would be an advantage for the residents to sell out at high prices.

This is strictly a condemnation of homes and or the FDES Hall in order to build this extension.

### **4. Rebuttal on "Salado Creek Street"**

To say that the "street shown...are only Diagrammatic in there location" is to ignore the impacts.

"Salado Creek Street" is shown as a street running west from Ward Avenue to Sperry Avenue near the existing airport. It will obviously become a defacto northern bypass at least until it comes to the bridge at Ward Avenue and Salado Creek. At that point people must either head north to Ivy to get to Highway 33 and its connection with Olive Avenue so they can go east or they must head south to M Street to go east.

The impacts of this new street are not adequately addressed or quantified.

### **5. Rebuttal to By-pass response.**

If the City Council accepts this response then they are deliberately trying to avoid the serious questions raised about the placement of the by-pass.

The plan shows the by-pass within reasonable configurations until it reaches Highway 33. See Map in Draft Final document Figure VIII-2.

At that point the line of the by-pass crosses dozens and dozens of pieces of property at an angle.

It appears to cross through the middle of the intersection of Sycamore and Fig.

While I understand that it may not actually do that, it still raises the question, how can a bypass be planned through this farming area?

What will be the impact of dividing a strip of farm between this bypass and the Patterson Water District main canal?

Again this points out that the failure to consider these impacts at this time may result in serious mistakes which can not be rectified by future "project" EIR's.

If it is later determined that the by-pass should have been on the north side of the PWD main canal, it will then be too late as industrial development will then have taken place on that land.

All because there was a failure to look at the specifics of even a general placement of the by-pass.

If West Main does not become 4 lanes over the next 20 years, then what purpose will a 4 lane by-pass serve?

The placement of the by-pass seems to be based on the idea that it's sole purpose is to get people from I-5 over to a point on East Las Palmas where they can continue on to Modesto or Turlock.

The reality is that the by-pass needs to provide an alternative means of getting people from the west end of Sperry to various points east of Highway 33. The further south the by-pass is placed, the less useful it becomes for people going from I-5 to homes and businesses east of Highway 33.

The EIR should address this impact. Will this force more people onto Sperry Avenue and even onto the new Salado Creek Street?

## **6. Rebuttal to the Circle Issue.**

This response is ignorant or deliberately misleading as to the impacts of the traffic that will be generated by the proposed plan.

The consultants are proposing a shopping and civic area on west Las Palmas and Ward. They have designated East Las Palmas as an Arterial, which will result in a funnel effect through the Circle to the shopping center and civic area. Anyone can see that this will result in a significant deterioration and no preservation of the character of the existing downtown area.

They don't project the Circle as a major route between Highway 33 and West Las Palmas, but the average person who knows Patterson or has



lived here even a few months, especially if they live on the east side can see how people are going to use the Circle to get to West Las Palmas.

The impact is identified but there is no adequate mitigation because of the East Las Palmas Funnel effect.

**7. Rebuttal to Orange Avenue connection to Highway 33.**

This response fails to address or consider the possible closure of F street.

If F street is to remain open, what about the need for a RR signal on this street? What about the impact of traffic being funnelled from 1st Street to F Street and thence across Highway 33?

Where is this impact addressed?

**8. No rebuttal.**

**9. Response to new designation of 9th Street as a Collector.**

9th Street has now been partially upgraded as a collector street with the exception of the section between Sperry and F Street. Its hard to understand why that small segment was left out. Surely this too should be a collector?

Since we know that a major school, the Patterson Jr. High which may become part of the High School, exists along the 9th Street collector, the impact of traffic in front of this school should be addressed in this EIR.

Modesto has such a collector in front of one of its high schools and they also have student fatalities in front of that High School. If that isn't an impact, then what is?

This impact is increased as a direct result of the closure of the section of Ward Avenue between 9th Street and West Las Palmas Avenue.

Given Modesto's experience, the placement of a shopping center near Ward and Sperry, student deaths on 9th is a certainty.

Leaving Ward Avenue open would downgrade that certainty by a great factor. Is a grid imposed over Ward Avenue worth it?

**10. Rebuttal re Diablo Range earth quake fault potential.**

As expected, this EIR downplays the potential of a damaging earth quake near Patterson and yet the potential is there.

Pretending that no planning can be done in relation to these faults, the San Joaquin Fault lies just west of I-5 and is .05 miles west of Oak Flat Road at I-5, is to downplay the seismic costs of construction in the Patterson area.

In particular these costs will occur on major bridge structures that will be needed at Sperry Avenue and I-5.

In addition there are other minor precautions that can be taken relative to failure of any portions of the California Aqueduct or Delta Mendota Canals.

Failure to recognize that these potentials exist is not unusual until an earthquake occurs where upon everyone wonders why it was not considered before.

Major active known destructive faults do exist within 35 miles of Patterson.

If anything was learned from the 1989 Loma Prieta earthquake, it was the major damage and deaths that occurred 75 miles away in San Francisco and Oakland.

Patterson is just 35 miles away from a fault, the Calaveras, which has as much or more potential than the Loma Prieta '89 quake.

No one expected an earthquake in the local of the Loma Prieta.

Closer to Patterson from the Calaveras fault lie three other faults, the first two considered active: the Green Valley fault which caused the damage to Livermore area, the Tesla-Ortigalita which may end near Coalinga and the fault just above I-5, the San Joaquin fault, said to be inactive.

Based on current studies, I believe all these faults will be upgraded in their potential distinctiveness in the next 10 years. Studies already indicate that the Coalinga earthquake was not all that rare.

11 through 13. No rebuttal.

**14. Rebuttal on Flood Maps and issue.**

The EIR still does not address the flooding which has historically taken place west of Patterson on the Campbell Ranches and Kaufmann and Broad properties as a result of Salado Creek.



Claude Delphia  
425 H Street, Patterson, 892-6018





# Stanislaus County

Chief Administrative Officer

P.O. Box 3404  
Modesto, California  
95353  
(209) 525-6333  
Fax (209) 544-6226

April 3, 1992

Mr. Rod R. Simpson, City Planner  
City of Patterson  
P. O. Box 667  
Patterson, California 95363

RE: DRAFT FINAL ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF  
PATTERSON GENERAL PLAN

Dear Mr. Simpson:

The Stanislaus County Environmental Review Committee (ERC) has reviewed the subject Environmental Impact Report (EIR) dated February 21, 1992.

The ERC generally concluded that all traffic impacts should be mitigated through County Public Facilities Fees. Agricultural buffer zones should be investigated to reduce the impact of potential drift from crop dusting, as identified by the County Agricultural Commissioner. The potential for hazardous waste may exist on the westside in the area of the Patterson Airport as future development occurs.

Individual County departments will identify and submit under separate cover more specific issues as they pertain to their area of expertise.

The ERC appreciates the opportunity to comment on this EIR.

Sincerely,

A handwritten signature in cursive script, reading "David L. Dolenar".

David L. Dolenar  
Deputy Administrative Officer

DLD:sbw

cc: Board of Supervisors  
Al Beltrami, CAO  
Reagan Wilson, AAO  
ERC Members

**Patterson Downtown Business Improvement Association**

Office: 355 W. Las Palmas Avenue (209) 892-3757

P.O. Box 1505, Patterson, California 95363

March 5, 1992

Mr. Rod Simpson, City Planner  
City of Patterson  
P.O. Box 667  
Patterson, CA 95363

Dear Mr. Simpson:

The Patterson Downtown Business Improvement Association has reviewed the general plan policy document and land use map. Our concern, like yours, is to preserve the current downtown. To that end we urge the city council to locate new commercial areas as close as possible to the current downtown and to be as connected as possible, both physically and functionally.

We would appreciate being consulted when new applications for commercial development are filed. Thank you.

Sincerely,



Mike McNaughton  
President



DEPARTMENT OF THE NAVY

NAVAL AUXILIARY LANDING FIELD  
CROWS LANDING, CALIFORNIA 95313

11000  
Ser 00/020  
1 Apr 92

City of Patterson  
Attn: Mr. Rod R. Simpson  
P.O. Box 667  
Patterson, CA 95363

Dear Mr. Simpson,

I, in conjunction with representatives of the National Aeronautics and Space Administration, we were pleased to note the area south of Elfers Road was removed from development.

Naval Auxiliary Landing Field, Crows Landing wants to continue to be welcome neighbors with the City of Patterson. Working together we can have a noise free environment as well as minimize hazards to aviation.

Thank again for the welcome opportunity to feel part of the growing community of Patterson.

*W. A. Carpenter*  
W. A. CARPENTER  
Lieutenant Commander, U.S. Navy  
Officer in Charge





# Del Puerto Hospital

Patterson's Not-For-Profit District Hospital



March 26, 1992

Mr. Jeffrey Parker  
City Manager  
City of Patterson  
P.O. Box 667  
Patterson, CA 95363

Dear Jeff:

Last evening the Board of Directors of the Patterson Hospital District reviewed Chapter V, Section H. "Medical Services" (Pages V-20-V-23) of the Draft Final Environmental Impact Report of the City of Patterson General Plan of February 21, 1992. The review was conducted as a regularly scheduled agenda item in open session.

The Board of Directors of the Patterson Hospital District voted unanimously to recommend adoption by the Patterson City Council of this "Medical Services" section into the final General Plan for the City of Patterson exactly as presented in the Draft EIR of February 21, 1992.

On a personal note, I want to thank all members of the Patterson City Council, the Patterson Planning Commission, J. Lawrence Mintier & Associates, and City Staff for their willingness to work with me on the General Plan process as it relates to the Patterson Hospital District over the past few years. Everyone has been most attentive to our situation, and helpful every step of the way. I am very grateful for the access we were provided to City officials throughout the entire process.

Thank you very much.

Sincerely,

Thomas Lynn Avery  
Administrator

TLA:jck

cc: Mayor Wade Bingham  
Mike Petrie  
Leo Halseth  
Pat Brennan  
James Madnick  
Dori Filippini, Chair, Planning Commission

H-12



POST OFFICE BOX 547 PATTERSON, CA 95363

209/892-3700

KEITH H. DANIEL, ED.D.  
DISTRICT SUPERINTENDENT

DENNIS SIOONA  
DIRECTOR  
Curriculum & Educational Services

STEVE MENGE  
DIRECTOR  
Administrative & Support Services

March 18, 1992

Rod Simpson  
Planning Director  
City of Patterson  
P. O. Box 667  
Patterson CA 95363

Dear Rod:

The proposed new General Plan policy statements and the draft Environmental Impact Report have been reviewed by the District Administration and Jack Schreder, our consultant. We believe that the policy statements in both documents relating to the schools meet the needs of the Patterson Jt. Unified School District.

Provided these statements remain intact, the District has no reason to oppose the implementation of the General Plan.

Sincerely,

Keith H. Daniel, Ed. D.  
Superintendent

KHD:bm



Yosemite Community College District

P. O. Box 4065 / Modesto, CA 95352 / 2201 Blue Gum Avenue / (209) 575-6508

March 13, 1992

Mr. Rod Simpson  
City Planner  
City of Patterson  
33 Del Puerto Avenue  
Patterson, CA 95363

Dear Mr. Simpson:

Thank you for forwarding a copy of the City of Patterson General Plan policy document. Obviously, it charts an interesting and definitive course of action for the City of Patterson's future.

In reviewing the section on education, I noted that no reference has been made to the higher education needs of Patterson residents. Yosemite Community College District staff are sensitive to the higher education needs of residents of western Stanislaus County and have developed a long-range plan which calls for the establishment of a college center in or around the City of Patterson.

Enclosed is a copy of a document entitled *Vision 2000* which references the District's plans for western Stanislaus County. (See page 42.) It is suggested that consideration be given to including a reference to higher education in the City's General Plan.

If I can be of further assistance in providing additional information, please call at your convenience. Best wishes.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Tom', is written over a faint, larger outline of the same signature.

Tom Van Groningen  
Chancellor

TVG:dea  
Enclosure  
cc: Board of Trustees  
Cabinet  
Dorothy Swartwood

H-14





# Stanislaus County

## Department of Environmental Resources

### Air Pollution Control District

1716 Morgan Road  
Modesto, California 95351  
(209) 525-4152

April 8, 1992

Rod Simpson, City Planner  
City of Patterson  
PO Box 667  
Patterson, CA 95363

RE: Review of Draft Final Environmental Impact Report for the City  
of Patterson General Plan

In EIR the City is committing to assist the Unified District minimize future increases in motor vehicle travel and to assist in implementing appropriate indirect source regulations adopted by the APCD. The Unified District appreciates this commitment. The attainment of ozone standards will require both a regional and local approach. To that end the Unified District is working to develop a Model Air Quality Element that will contain specific policies and programs which can be included in future revisions of local agencies general plans.

DAVID L. JONES  
Air Quality Planner

March 16, 1992

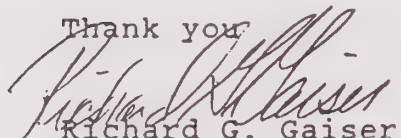
To: Rod Simpson  
City Planner  
City of Patterson

Re: City of Patterson, Fire Department, Fire Chief's review of  
Draft EIR of City of Patterson's General Plan dated February  
21, 1992.

Rod:

I have reviewed the above document and I wish to make a few  
comments on its content. Please, if you have questions,  
direct them to me and we can discuss them.

Thank you



Richard G. Gaiser  
Fire Chief  
City of Patterson

pg II-3 paragraph E with regard to parks and recreation facilities.

With the relocation of the headquarter's fire station (and addition of a 2nd station for the more remote areas of the City) it gives us the opportunity to site a fire facility adjacent to a park. This should be advantageous to both parks and fire, providing additional security to parks and a site for recreation for the fire service.

pg IV-7 Intersection Signalization:

I was surprised that the intersection of Sycamore and Las Palmas was not included on this list.

Also, costs should be included in mitigations, for emergency vehicular control of intersection lights. Example of fire engines controlling intersection lights.

pg V-1 B. Water, second paragraph. Statement regarding the city's ground water wells operating at 50 % of capacity. Is this domestic only or is fire flow also considered in this statement. I seriously doubt that fire flow was considered when this statement was made.

pg V-4 IV.A.7. Can we also include language here which would indicate the City's desire to have at least 50% of the City's wells capacity equipped with standby power?

pg V-14 E. Police 1. Implications of the General Plan Land Use Diagram.

I point out this section because it makes very specific the numbers of personnel required per 1000 population. This information is available for paid firefighter's. Do you wish it, and if not, why not?

pg V-15 I.F.3. Fire Department (both City and Fire District) are opposed to any joint public safety facilities with law enforcement.

pg V-15 F. Fire., second paragraph is in error. Could be rewritten as follows: "In 1990, the Patterson fire Department was staffed by 40 volunteers who, along with 85 other volunteers, served the West Stanislaus County Fire Protection District.

pg V-15 F. Fire. 1. Implications of the General Plan Land Use Diagram.

No where do we see written a standard of 1.0 to 1.25 sworn full-time fire fighters to 1000 population, as we saw in the law enforcement section. Obviously we would like to maintain an active volunteer firefighting force, but we also need to lay the foundation for full time personnel if the need or demand exists, as well as full time support personnel as clerical staff, chief and training officers, etc.

I think we can do a much more comprehensive job than this one.



pg V-16 2. General Plan Policy Response paragraph IV.F.1.

I feel we have set our goals on too easy an objective. Presently we have a ISO Rating of 6 which we received as a result of a City wide grading in 1978. For comparison, the City of Newman underwent a grading a few years ago and received a 5 rating. The West Stanislaus County Fire Protection District was regraded two years ago and received a class 5 for the communities of Westley, Grayson, and Crows Landing.

The City of Patterson's water system is, in many ways, much more adequate than Westley's system and is definitely more adequate than Grayson's, Crows Landing's and Newman's and many times improved over what it was in 1978.

Add the City of Patterson's response record to structure fires, and training, we should easily attain a class 5 in our next rating (due in '83) and hopefully lower. If we did not receive a lower rating than a class 5, I would hope not to destroy our initiative to do better by setting too easily attainable goals.

pg V-16 4. Mitigation Measures. None Required.

No where in this document have I seen anything to do with financial support of the fire department. The last engine cost the City over \$200,000.00 and it was replacing an engine. The next engine will cost over \$250,000 and presently, aerial apparatus costs over half a million. Our present operational budget represents less than \$100,000.00 annual drain on the General Fund and we are having quite a time surviving.

Both development fees for new development and annual benefit assessments for salaries and annual operational expense (including replacement apparatus) need to be addressed.

pg VIII-4 D. 2. VII.C.1. Would like to see wells with stand-by power supplies included here.

Pg VIII-5 VII.C.3.

This line makes reference to an ongoing fire and life safety inspection program for all public, commercial, and industrial buildings. ---We are presently doing this with one very dedicated volunteer fire inspector. We cannot do this in the future (unless this guy does it forever) without adequate funding to hire personnel for this purpose.

pg VIII-5 4. Mitigation Measures.

Again, Development Fees and Annual Benefit Assessments need to be addressed as funding mechanisms for fire protection.

pg VIII-6 VII.D.2. Speaking of Emergency Access Routes, the dead-ending of Ward Avenue certainly discourages the area of

Ward/Las Palmas/Sperry as a fire station location.  
pg VIII-6 paragraph VII.D.5. The City shall identify and develop a command center for use during times of emergency. This is fine, however if our present dispatch center is up and operational, it may be too much of a luxury to expect someone from fire to staff the city's command center.

In closing, a couple of items which are extremely important which have not adequately been emphasized in this document.

First, the present fire station is very centrally located and very adequately meets response distance requirements. However, if this station is relocated, it is most probable that the time/response distances will be exceeded for some areas of our existing city. Consequently, a second station needs to be discussed in this document. That subject has not been addressed.

Second, the proposed elimination of Ward avenue between Las Palmas and North 9th Street, limits the effectiveness of a fire station in that vicinity. Alternate locations may be more feasible if this through street is closed.

And finally, no where does this document address the West Stanislaus Fire District/City of Patterson relationship. There are more cost effective ways to run a fire department than we are doing now, although there are less cost effective ways also. Maybe this is not the proper vehicle for the exploration of this concept, however, when dealing with funding of fire protection, this may be the necessary vehicle.

4701 Sisk Road, Suite 201

Modesto, California 95356

Tel: (209) 545-6500 Fax: (209) 545-6550

March 30, 1992

Manager Jeff Parker, Mayor Bingham and Councilmen  
City of Patterson  
P.O. Box 667  
Patterson, CA 95363

Re: Latest DEIR and G.P. Policy Document

Dear City Officials:

Attached is my "spread sheet" overview of our most important comments and concerns on the latest G.P. documents. Few of these comments are new, and we have submitted most of them many times before in various written and verbal testimony. My intent is NOT to:

1. Slow down the approval process.
2. Expect that all these changes will be made at this time.

My intent and request is that these comments be reviewed as part of this approval process, and changes in the final documents be made, as necessary, to:

1. Increase the flexibility of the plan to allow the City opportunities to explore and create practical infrastructure and implementation solutions and programs.
2. Make those changes now which are needed to keep these documents from working against the City as you translate the "pretty pictures" and concepts into real life applications. Those changes which I believe should be made now are indicated on the spread sheet with double asterisks (\*\*).



You deserve much credit for the incredible expenditures of time and energy required by this General Plan process so far. You have had to deal with the nightmare of a total G.P. re-write; the vicious attacks of no-growth extremists; the ignorance of many; and the disappointment of consultants who see Patterson as a text book experiment rather than a real city full of real people and knowledgeable public officials. My hat is off to all of you. I look forward to the conclusion of this "theoretical" planning part of the exercise, so we can get on with the "human" planning functions. Thank you for your dedication and time.

Sincerely,

KAUFMAN AND BROAD  
CENTRAL VALLEY, INC.



Ron West  
Director of Forward Planning

RW/dm

Agenda, 7:30 p.m., March 24, 1992  
King - Kennedy Memorial Center

CITY OF MODESTO  
MEMORANDUM

Friday, March 13, 1992

TO: Mayor and Members of the City Council  
Chairperson and Members of the Planning Commission

FROM: William S. Nichols, Planning and Community Development Director *WSN*

SUBJECT: Revision of Housing Element Executive Summary

Based on input received, staff has already revised the Housing Element Executive Summary. Please find it attached for your information.

WSN/MB

cc J. Edward Tewes, City Manager  
Stan Yamamoto, City Attorney  
Norrine Coyle, City Clerk (16)  
Becky Jenkins, Planning (10)

## EXECUTIVE SUMMARY *(revised)*

The purpose of the Housing Element of the General Plan is to assure the "early attainment of decent housing and a suitable living environment for every Californian family", particularly for low- and moderate-income households (Government Code Section 65580). Modesto's present Housing Element was adopted in July 1984, in accordance with State law in effect at that time. The Government Code (Section 65588) now requires that the Housing Element be revised to meet current State law requirements, no later than July 1, 1992.

The Housing Element is intended to guide residential development and preservation in a way that supports the overall economic and social values of the community. The residential character of a city is largely dependent on the type and quality of its residential neighborhoods and the dwelling units within them. This Housing Element is an official response to a continuing awareness of the need to provide housing for all economic segments of the community. Highlights of key issues addressed in this Housing Element update are included below:

### Evaluation of 1984 Housing Element

Current State Housing Element Guidelines (Government Code Section 65588) require that communities evaluate their previous Housing Element according to the following criteria: (1) the effectiveness of the Housing Element; (2) the progress on the implementation of the Housing Element; and (3) the appropriateness of the Housing Elements Goals, Policies and Objectives.

Overall, the goals, policies and programs in the current 1984 Housing Element were very successful in providing affordable housing, as well as meeting a diversity of housing needs. Of the 13,336 new housing units built in the City of Modesto between 1984 and 1989, 32 percent were available to those in the very-low and low-income households. Furthermore, by adding the units provided to moderate-income households raises the total number of affordable units to 85 percent.

The goals and programs of the Housing Element have been evaluated in light of what the City has done or what other agencies or groups have completed during 1984-1989. Other factors affecting the success of the 1984 Housing Element included the effects of the economy in general, and the availability of limited state and federal funding. (This portion of the Housing Element is located in Chapter 2.)

### Regional Housing Needs

The Stanislaus Area Association of Governments (SAAG), as required by State law, determined in February 1990, the City's projected share of regional housing needs through 1997, for persons of all income levels. In March 1990, the Modesto City



Council adopted Resolution No. 91-178, accepting SAAG's allocation of 11,688 housing units as Modesto's share of the 1990-1997 Regional Housing Needs. The City is required by state law to incorporate its regional share into the Housing Element update (located in Chapter 3). The Housing Element update requires the development of local housing programs to help meet the existing and projected housing needs of all income groups.

Certain segments of the population may have a more difficult time finding decent, safe and affordable housing due to special circumstances. In Modesto, the special needs groups include the elderly, handicapped persons, farmworkers, large families, female-headed households, and the homeless.

### Housing Element Programs

Chapter Four contains the goals, policies and programs the City intends to implement during the Housing Element planning period of 1992-1997. The Housing Element programs, particularly the programs with quantified objectives, are of particular importance. The quantified objectives are directly related to the City's ability to meet its fair share of the Regional Housing Needs. The following chart highlights key programs from Chapter 4 that will assist the City in achieving its fair share of the Regional Housing Needs:

**Key Programs Addressed in the Housing Element <sup>1</sup>**

Program	Rehabilitation or New Construction	Quantified Objective	Targeted Income Group
Housing Maintenance Program	Rehabilitation	600 Units	Very-low and Low-Income
Density Bonus	New Construction	500 Units	Very-low and Low-Income
Village One Hsg. Trust Fund/Equity Sharing	New Construction	322 Households 101 Households	Moderate/ Low-Income
Section 8 Certificates *	NA- (Existing or New Housing)	250 Households	Very-low Income
Village One Renters Assistance Program	New Construction	138 Households	Very-low Income
Single Room Occupancy	New Construction	50 Units	Low-Income
Rental Rehab. Program	Rehabilitation	50 Units	Low- and Mod. Income
CA. Housing Rehab. Program	Rehabilitation	50 Units	Low-Income
Second Units	New Construction	50 Units	Low-Income

\* This number is in addition to the 2,786 Section 8 Certificates that already exist in the City of Modesto.

<sup>1</sup> Note: A complete list of all programs is provided in Chapter 4.

03/30/92

## KAUFMAN &amp; BROAD COMMENTS: PATTERSON D.E.I.R.

	PAGE/REF.	ISSUES -- TOPIC	CONCERNS -- POINTS	RECOMMENDATION -- COMMENT
**	VII-11 (San Joaquin Kit Fox) (Also VIII-12 Kit Fox) (Also see G-11 and G-28, 3)	"...Kit fox have been observed denning in Walnut Orchard... in the Central Valley..."	This unsupported statement is too general to have any meaning - But, will certainly cause prob- lems later. <u>Who</u> observed the species? How do they know what it was? Where? When? So what?	Omit this statement or make it apply to this plan.
**	VIII-8 (Table VIII-1)	Noise Contour Data	Does not include noise impacts on K & B neighborhoods from proposed 4-lane road.	Omit 4 lane road then residential neighborhoods.

3/27/92

KAUFMAN & BROAD COMMENTS: PATTERSON POLICY DOCUMENT

	PAGE/REF.	ISSUES -- TOPIC	CONCERNS -- POINTS	RECOMMENDATION -- COMMENT
	I-1; First paragraph under "Land Use Diagram and Standards"	Land Use Diagram boundary lines "in most cases follow parcel lines".	On K & B and adjoining parcels, gross violations of this policy exist; Diagonal grid pattern necessarily violates almost all property lines in western extension area.	(Ultimately) correct this problem. Use Ward Ave. alignment for this correction.
	I-4; Fig 1-1; Fig 1-2	Diagonal grid and "star burst" road pattern.	Not an acceptable, practical, safe, or buildable concept.	(Ultimately) correct.
** H-26	II-9 (II.A.4.)	Inclusionary zoning.	Unworkable, unfair, legally challengeable and, most importantly, unnecessary form of government intervention.	Re-word to allow and encourage a variety of methods for <u>the market</u> to provide housing for all levels of income. (See Modesto Housing Element Report of <u>market-driven</u> affordable housing supply).
**	II-9 (II.A.9.)	Secondary Residential Units "shall be encouraged".	Add: "And, (affordable) housing credit shall be given for units and/or stub outs for future units."	Make sure this excellent concept gets used . . .
**	II-13 (first paragraph)	Housing Element Time frame (July 1991 - June 1997)	G.P. delays have extended all target and planning dates.	Update.
**	II-18 (Quantified Objectives)	Housing needs goals based on out of date SAAG numbers.	New (lower) SAAG numbers have been adopted which more realistically project growth expectations.	Update.



3/27/92

KAUFMAN & BROAD COMMENTS: PATTERSON POLICY DOCUMENT

	PAGE/REF.	ISSUES -- TOPIC	CONCERNS -- POINTS	RECOMMENDATION -- COMMENT
**	II-28 (IV.B.3.)	New sewer capacity - specifies "pond" system.	Need Flexibility to allow City to consider second ("package") sewer plant on West side.	Amend/add wording to allow this flexibility.
**	II-30 (IV.G.6.)	Schools "full mitigation" wording.	State and others have some responsibility for public schools; "full mitigation" is not legal or fair if tiny percent of population pays share of others.	Omit this section; IV.G.7. fulfills City's goals.
** H-27	II-35 IV.A.2; V.A.3.)	Parkland extractions of 5 ac/1000 pop.	Quimby Act makes this clearly illegal; 3 ac/1000 is max. state law allows in Patterson situation.	Correct -- or at least note conflict with State law.
	II-57 (VIII.B.1.)	Diagonal grid/sun-ray street extension; specifies civic center location.	(See first item pg 1); need flexibility in civic center location (ie: to allow City to negotiate with school district to convert existing school if appropriate).	(See first item, pg 1); Add flexibility.
**	II-58 (VIII.B.4.)	Anti-car rhetoric.	Soften wording to allow City some realistic options when these details are being implemented.	Re-word.
	II-60 (VIII.1.)	Sun-ray streets, etc.	(Same as above.)	Re-word.
	MAP	Land uses, circulation, on K & B site.	(Same as above.)	

3/30/92

KAUFMAN & BROAD COMMENTS: PATTERSON D.E.I.R.

	PAGE/REF.	ISSUES -- TOPIC	CONCERNS -- POINTS	RECOMMENDATION -- COMMENT
	II-8 (Table II-5)	Commercial acreage way too high in plan.	224 acres @ FAR of .40 (allowed by G.P.) = almost 4 million s.f. of commercial space (equivalent of 3 Vintage Faire Malls!) 224 acres @ FAR of .25 ("expected") = approx. 2 1/2 million s.f. (2 Vintage Faire Malls).	Add enough flexibility to plan to allow realistic market factors to be used as appropriate.
**	III-4 (Center)	Discussions of County Draft Ag Element.	Draft continues to be updated and revised; final form available soon.	Update as needed once final Ag Element is adopted.
**	H-28 III-7 (II.A.4.)	Inclusionary Zoning	Need more flexibility to allow and encourage affordable housing.	Add flexibility wording.
**	III-10 (Center)	Quantified (affordable) housing goals.	Based on out-of-date SAAG numbers.	Update.
**	IV-3 (Center)	Ward Ave. closure	Need flexibility so that realistic infrastructure options can be considered.	Add flexibility wording.

3/30/92

## KAUFMAN &amp; BROAD COMMENTS: PATTERSON D.E.I.R.

	PAGE/REF.	ISSUES -- TOPIC	CONCERNS -- POINTS	RECOMMENDATION -- COMMENT
H-29	** IV-3 (last paragraph) (Also Land Use & Circulation Map & other references; inc. Fig IV-1 and 2; Table IV-2; etc.	18-19 yr. traffic conditions based on some <u>very unlikely</u> assumptions. These greatly exaggerated numbers are reflected in highly inflated traffic needs, lane needs, etc.	False assumptions include: 1. Full build out of entire plan ("including the reserve areas") by the year 2011. 2. 30,000+ population by year 2011. 3. Full build out of commercial equivalent to 2-3 Vintage Faire Malls. 4. Full build out of medical center for western Stanislaus County. 5. Level C on all roads (when level D is expected and acceptable in some cases).	Re-do this section, Circulation Plan, costs, etc., to reflect more reasonable assumptions. No need to build, finance, maintain 200-300% of the road system really needed.
	** IV-G "Four Lane Roads" Section (also IV-8)	Four lane road shown thru K & B neighborhoods!	Based on above, and safety/noise impacts, this road must be reduced to two lanes!	Re-calculate numbers and, <u>OMIT</u> expressway thru neighborhoods!
	** IV-9 (III.A.G.)	Anti-parking rhetoric.	Unwise, dangerous, unworkable.	Omit.
	** V-9 (Wastewater master plan)	Line Sizes, etc., specified assume huge expansion of existing plant as only option.	Need flexibility so city can at least look into second (package) plant on west side.	Add enough flexibility for City to consider all its options.



03/30/92

## KAUFMAN &amp; BROAD COMMENTS: PATTERSON D.E.I.R.

	PAGE/REF.	ISSUES -- TOPIC	CONCERNS -- POINTS	RECOMMENDATION -- COMMENT
**	V-9 (B-4)	Expansion of existing sewer plant -- requires 650 additional acres? Incredible costs could be involved!	650 acres @ \$5,000/ac = \$3.25 m. @ \$7,500/ac = \$4.9 m. @ \$10,000/ac = \$6.5 m. For the above costs, an entire new package plant could be built (on 5 or less acres).	See above. Consider a second plant at <u>millions</u> in cost savings.
**	V-13 (Pipe specs - Several references)	4.2 miles of pipe, up to 10 feet in diameter, at <u>incredible</u> cost.	Too expensive -- need to get more open channels and less pipe.	Ask consultant to review.
**	V-19 (and Errata Sheet (IV.G.6.))	"Full mitigation" wording for schools.	Premature, not clearly legal.	Re-word to give City flexibility and control.
H-30	V-23 and V-24	Solid waste projections - do not reflect future re-cycling reductions.	V.D.1. (pg V-24) specifies goal of 50% reduction; yet, plan projections do not assume any reduction.	Check.
	VI-1 (B.1) (Also VI-2 (V.A.2. and V.A.#.))	Parkland deduction at 5 ac per 1000 population.	State law limits required dedication or fees to ratio of 3 ac per 1000 population.	Plan shall specifically state that extra acreage desired must be financed separately. (Add V.A.15 on pg VI-3?)
**	Figure VI-1 (Parks)	Indicates "plaza" on K & B side.	Need more detail on facilities assumed -- or more "flexibility wording".	Add flexibility wording to allow this plaza concept to be discussed.

## GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET  
SACRAMENTO, CA 95814

Apr 10, 1992

ERIC BROWN  
CITY OF PATTERSON  
P.O. BOX 667  
PATTERSON, CA 95363Subject: GENERAL PLAN UPDATE - CITY OF PATTERSON  
SCH # 90021012

Dear ERIC BROWN:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation. These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Russell Colliau at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Christine Kinne'.

Handwritten initials 'CK' in cursive script.  
Christine Kinne  
Acting Deputy Director, Permit Assistance

Enclosures

cc: Resources Agency

H-31

1. Project Title: Draft Final EIR-City of Patterson General Plan

2. Lead Agency: City of Patterson 3. Contact Person: Rod Simpson

2a. Street Address: 33 Del Puerto Ave 3b. City: Patterson

2c. County: Stanislaus 2d. Zip: 95363 2e. Phone: 209/892-2041

3. Project Location: 4. County: Stanislaus 4a. City/Community: Patterson

4b. Assessor's Parcel No.: Entire 4c. Section: Entire 4d. Type: Entire

4e. Patterson City Limits plus approx. 3,100 acres surrounding unincorp. area.

4f. Cross Streets: I-5, Sperry Avenue 4g. Community: Patterson

5. Within 3 miles: 5a. State: 33 5b. Air: Patterson, Crow Landing 5c. Rail: SPRR 5d. Water: San Joaquin R

6. PROJECT TYPE: 6a. Local Action Type: 6b. General Plan Update: 6c. Industrial: 7789 Acres: 1975

6d. New Element: 6e. General Plan Amendment: 6f. Additions: 54000 Acres: 26 Employees: 97

6g. New Use: 6h. General Plan: 6i. Shopping/Commercial: 2,581,000 Acres: 224 Employees: 4656

6j. Draft EIR: 6k. Amusement: 6l. Industrial: 7,462,000 Acres: 587 Employees: 8853

6m. Supplement/ Subsequent EIR (Prior SCH No.): 6n. Specific Plan: 6o. Water Facilities: 6.8

6p. Community Plan: 6q. Transportation: New Roadways and improvements to existing

6r. Redevelopment: 6s. Land Division (Subdivision, Parcel Map, Tract Map, etc.): 6t. Mining: roads

6u. Other: 6v. Other: 6w. Other: 6x. Other: 6y. Other: 6z. Other

7. PROJECT TYPE: 7a. Local Action Type: 7b. General Plan Update: 7c. Industrial: 7789 Acres: 1975

7d. New Element: 7e. General Plan Amendment: 7f. Additions: 54000 Acres: 26 Employees: 97

7g. New Use: 7h. General Plan: 7i. Shopping/Commercial: 2,581,000 Acres: 224 Employees: 4656

7j. Draft EIR: 7k. Amusement: 7l. Industrial: 7,462,000 Acres: 587 Employees: 8853

7m. Supplement/ Subsequent EIR (Prior SCH No.): 7n. Specific Plan: 7o. Water Facilities: 6.8

7p. Community Plan: 7q. Transportation: New Roadways and improvements to existing

7r. Redevelopment: 7s. Land Division (Subdivision, Parcel Map, Tract Map, etc.): 7t. Mining: roads

7u. Other: 7v. Other: 7w. Other: 7x. Other: 7y. Other: 7z. Other

8. PROJECT TYPE: 8a. Local Action Type: 8b. General Plan Update: 8c. Industrial: 7789 Acres: 1975

8d. New Element: 8e. General Plan Amendment: 8f. Additions: 54000 Acres: 26 Employees: 97

8g. New Use: 8h. General Plan: 8i. Shopping/Commercial: 2,581,000 Acres: 224 Employees: 4656

8j. Draft EIR: 8k. Amusement: 8l. Industrial: 7,462,000 Acres: 587 Employees: 8853

8m. Supplement/ Subsequent EIR (Prior SCH No.): 8n. Specific Plan: 8o. Water Facilities: 6.8

8p. Community Plan: 8q. Transportation: New Roadways and improvements to existing

8r. Redevelopment: 8s. Land Division (Subdivision, Parcel Map, Tract Map, etc.): 8t. Mining: roads

8u. Other: 8v. Other: 8w. Other: 8x. Other: 8y. Other: 8z. Other

9. PROJECT TYPE: 9a. Local Action Type: 9b. General Plan Update: 9c. Industrial: 7789 Acres: 1975

9d. New Element: 9e. General Plan Amendment: 9f. Additions: 54000 Acres: 26 Employees: 97

9g. New Use: 9h. General Plan: 9i. Shopping/Commercial: 2,581,000 Acres: 224 Employees: 4656

9j. Draft EIR: 9k. Amusement: 9l. Industrial: 7,462,000 Acres: 587 Employees: 8853

9m. Supplement/ Subsequent EIR (Prior SCH No.): 9n. Specific Plan: 9o. Water Facilities: 6.8

9p. Community Plan: 9q. Transportation: New Roadways and improvements to existing

9r. Redevelopment: 9s. Land Division (Subdivision, Parcel Map, Tract Map, etc.): 9t. Mining: roads

9u. Other: 9v. Other: 9w. Other: 9x. Other: 9y. Other: 9z. Other

10. PROJECT TYPE: 10a. Local Action Type: 10b. General Plan Update: 10c. Industrial: 7789 Acres: 1975

10d. New Element: 10e. General Plan Amendment: 10f. Additions: 54000 Acres: 26 Employees: 97

10g. New Use: 10h. General Plan: 10i. Shopping/Commercial: 2,581,000 Acres: 224 Employees: 4656

10j. Draft EIR: 10k. Amusement: 10l. Industrial: 7,462,000 Acres: 587 Employees: 8853

10m. Supplement/ Subsequent EIR (Prior SCH No.): 10n. Specific Plan: 10o. Water Facilities: 6.8

10p. Community Plan: 10q. Transportation: New Roadways and improvements to existing

10r. Redevelopment: 10s. Land Division (Subdivision, Parcel Map, Tract Map, etc.): 10t. Mining: roads

10u. Other: 10v. Other: 10w. Other: 10x. Other: 10y. Other: 10z. Other

11. PROJECT TYPE: 11a. Local Action Type: 11b. General Plan Update: 11c. Industrial: 7789 Acres: 1975

11d. New Element: 11e. General Plan Amendment: 11f. Additions: 54000 Acres: 26 Employees: 97

11g. New Use: 11h. General Plan: 11i. Shopping/Commercial: 2,581,000 Acres: 224 Employees: 4656

11j. Draft EIR: 11k. Amusement: 11l. Industrial: 7,462,000 Acres: 587 Employees: 8853

11m. Supplement/ Subsequent EIR (Prior SCH No.): 11n. Specific Plan: 11o. Water Facilities: 6.8

11p. Community Plan: 11q. Transportation: New Roadways and improvements to existing

11r. Redevelopment: 11s. Land Division (Subdivision, Parcel Map, Tract Map, etc.): 11t. Mining: roads

11u. Other: 11v. Other: 11w. Other: 11x. Other: 11y. Other: 11z. Other

CLEARINGHOUSE CONTACT: Russ Colliau  
(916) 445-0613

STATE REVIEW BEGAN: 2-25-92

DEPT REV TO AGENCY: 4-3

AGENCY REV TO SCH: 4-8

SCH COMPLIANCE: 4-10

PLEASE NOTE SCH NUMBER ON ALL COMMENTS

PLEASE FORWARD LATE COMMENTS DIRECTLY TO THE LEAD AGENCY ONLY

AQMD/APCD: 34 (Resources: 2,129)

Stanislaus

(\*S\* = sent by lead / \*\* = sent by SCH)

CMT SNT

Resources

Conservation

Fish & Game

DWR

Caltrans

Food & Ag

Welfare

CMT SNT

Water Quality

Water Supply

Wetland/Recreation

Wildlife

Soil Erosion

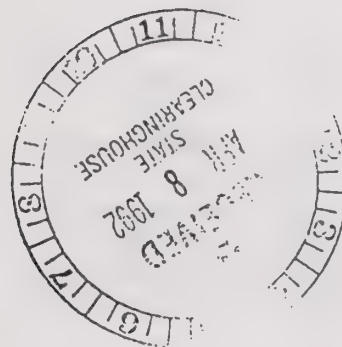
Soil Salinity



# Memorandum

Date : March 9, 1992

4/10



- : 1. Project Coordinator  
2. City of Patterson  
33 Del Puerto Avenue  
Patterson, California 95363  
Attention: Rod Simpson

From : Department of Water Resources

Subject: SCH 90021012, City of Patterson, Final EIR-General Plan

The Division of Operations and Maintenance of the Department of Water Resources has received and reviewed the above referenced EIR and forwards the following comments to you:

This final EIR (FEIR) is the follow-up report of the DEIR reviewed by the Department of Water Resources on May 22, 1991. Both the draft report and the final report were submitted under the same State Clearing House designation "SCH 90021012".

The Department's concerns regarding the Patterson General Plan were addressed in our review of SCH 91122005, Patterson Gateway General Plan Amendment. That report details the rezoning of approximately 48 acres from agricultural lands to Commercial/Planned Development. These lands abut the easterly edge of the California Aqueduct right-of-way and include the improvements to Sperry Avenue and drainage plans for a 100-year flood. The other items mentioned in the FEIR are located downslope from our facility and pose no adverse environmental impact.

A copy of our response to the SCH 91122005 review is enclosed for your convenience.

If you have any questions, please contact David Wrightsman at (916) 653-7168.

*Keith G. Barnett*

Keith Barrett, Chief  
Division of Operations  
and Maintenance

Enclosure

February 21, 1992

1. Project Coordinator  
Resources Agency
2. Stanislaus County Planning Department  
1100 H Street  
Modesto, California 95354  
Attn: Chip Sellers

**SCH 91122005, Patterson Gateway General Plan Amendment/Rezone,  
Draft Focused Environmental Impact Report, Stanislaus County**

The Division of Operations and Maintenance of the Department of Water Resources has received and reviewed the above referenced Draft Environmental Impact Report (DEIR) and forwards the following comments to you:

The DEIR addresses the proposal to amend the Stanislaus County General Plan to allow for a zone classification change of the applicant's 48.8-acre parcel. The existing General Plan designations on the parcel include a combination of both "Highway Commercial/Planned Development" and "Agriculture", of which 36 of the total 48.8 acres are under the "Agriculture" zoning. The DEIR proposes that the 36-acre portion (agriculture) be rezoned to Commercial/Planned Development.

The rezoning, if approved, will accommodate a 151,670 square foot commercial/visitor serving development which includes a 90-room hotel, restaurants, fast food outlets, entertainment center, gas station, and a recreational vehicle park.

The parcel is bounded on the north and east by the Delta-Mendota Canal, on the south by Sperry Avenue, and on the west by Rogers Road. The southwest corner of the 48.8-acre parcel very nearly abuts the California Aqueduct right-of-way where Sperry Avenue crosses the California Aqueduct.

In addition, the DEIR addresses the design for handling 100-year flood flows from the Black Gulch Creek watershed via two separate plans for retention facilities with 300 acre feet of storage capacity. The first proposal is a detention basin located within the 48.8-acre parcel, with the alternate proposal detailing a 100-acre storm drain detention basin situated on the adjacent property which shares some 2200 feet of property line with the east side of the California Aqueduct.

Project Coordinator, et al  
February 21, 1992  
Page Two

We have no adverse comments relative to environmental impact. However, we will be addressing technical concerns as part of our review of an encroachment permit for the project.

If you have any questions, please contact David Wrightsman at (916) 653-7168.

*Original Signed By*

Keith Barrett, Chief  
Division of Operations  
and Maintenance

bcc: D. Starks/DFD  
R. Winkler/DFD  
S. Sangalang/DFD  
C. Winston/431

DWrightsman:lmb  
A:SCH2005/wp51





## APPENDIX J

### RESPONSE TO DRAFT FINAL EIR COMMENTS

The following list identifies the written comments received on the *Draft Final EIR* (included as Appendix H). Each comment is summarized and a response given.

Date	Agency/Individual
4/10/92	Claude Delphia, 425 H Street, Patterson
4/3/92	David L. Dolenar, Deputy Administrative Officer, Stanislaus County, P.O. Box 3404, Modesto, CA 95353
3/5/92	Mike McNaughton, President, Patterson Downtown Business Improvement Association, 355 W. Las Palmas Avenue, Patterson, CA 95363
4/1/92	W.A. Carpenter, Lieutenant Commander, U.S. Navy, Naval Auxiliary Landing Field, Crows Landing, CA 95313
3/26/92	Thomas Lynn Avery, Administrator, Del Puerto Hospital, P.O. Box 187, Patterson, CA 95363
3/18/92	Keith H. Daniel, Superintendent, Patterson Unified School District, P.O. Box 547, Patterson, CA 95363
3/13/92	Tom Van Groningen, Chancellor, Yosemite Community College District, P.O. Box 4065, Modesto, CA 95362
4/8/92	David L. Jones, Air Quality Planner, Stanislaus County Department of Environmental Resources, Air Pollution Control District, 1716 Morgan Road, Modesto, CA 95351
3/16/92	Richard G. Gaiser, Fire Chief, City of Patterson
3/30/92	Ron West, Kaufman & Broad, 4701 Sisk Road, Suite 201, Modesto, CA 95356
4/10/92	Governor's Office of Planning and Research, Compliance notice, April 10, 1992
3/9/92	Keith Barrett, Chief, Division of Operations and Maintenance, California Department of Water Resources, March 9, 1992

## Letter Summary

Mr. Delphia discusses several issues in his letter, including rebuttals to the responses to his letters on the *Draft EIR*. Delphia's letter.

Comment: Mr. Delphia questions whether policies can be used as mitigation measures.

Response: The *General Plan EIR* is a program EIR rather than a project EIR, as described in the Introduction of the *EIR* under "Types of EIRs." Since no specific development project is proposed as part of the *General Plan*, policies of the *General Plan* are included to apply to future development under the *General Plan* in order to mitigate potentially adverse impacts. The function of the *General Plan* program is to identify the cumulative impacts which might not be addressed on a project-by-project basis and make mitigations of impacts City policy. Future development in the city must be consistent with the policies of the *General Plan*, and therefore consistent with its policies. Further, Program IX.1 of the *General Plan* requires that the Planning Commission review City *General Plan* policies to ensure they are being carried out. This program will act as a mitigation monitoring mechanism to ensure that the policies of the *General Plan* which are designed to mitigate the impacts of development under the *General Plan* are being implemented.

Comment: Mr. Delphia challenges the use of project-specific EIRs to determine individual project impacts as "splitting projects." He particularly raises this issue concerning roadways.

Response: According to Section 15146 of the *CEQA Guidelines*, "[T]he degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy. (b) An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction project that might follow." The *CEQA Guidelines* further note that in *Atherton v. Board of Supervisors of Orange County* (1983), "an EIR need not engage in a speculative analysis of environmental consequences for future and unspecified development." For the *Patterson General Plan* which is the project for this *EIR*, there are aspects of the project that cannot be evaluated in detail at this time. Precise design of many of the implementation measures will require detailed engineering studies at the time of implementation. When actual construction projects are proposed for implementation, if there are issues which need to be addressed further, the City will require subsequent project EIRs to address those issues.

Comment: Mr. Delphia suggests that Figure IV-1 should indicate future traffic volumes for 9th Street, since he presumes that traffic will be rerouted from Ward Avenue to 9th Street.

Response: Due to an oversight, the volumes for 9th Street were omitted from this figure. It should have been shown as 7,500 vehicles per day in this figure. Figure IV-1 was corrected in the *Final EIR* to include future traffic volumes for 9th Street.

Comment: Mr. Delphia questions whether Orange Avenue will be reduced from four lanes to two lanes at Orange and Locust Avenue after the Sperry/Orange Avenue correction.

Response: Figure IV-2 should have shown four lanes from Second Street to Locust Street on Sperry extended to the east. At Locust it should transition to a two-lane roadway, since the projected volumes (on Orange) east of Locust will not require a four-lane facility. Figure IV-2 was corrected in the *Final EIR*.

Mr. Delphia also made several rebuttals to the responses to his comments on the *Draft EIR*. These are summarized below.

Comment: Mr. Delphia questioned a page concerning traffic standards missing from first printings of the *Draft Policy Document*.

Response: This page was missing as a result of a printing error. As soon as this was realized, the page was made available at public hearings and was included in all subsequent printings of the *Draft Policy Document* and in the revised *Policy Document* released along with the *Draft Final EIR*.

Comment: Mr. Delphia suggests that widening East Las Palmas to four lanes without turn lanes would be a mistake. Mr. Delphia also questions whether West Main or Carpenter outside Patterson are likely to be widened to provide adequate capacity.

Response: The rebuttal restates and expresses opinions on issues raised in the previous comments. Regarding widening Las Palmas to four lanes, no response in addition to the previous response is required. West Main street is envisioned to be widened as part of the County's Capital Facilities Fee program.

Comment: Mr. Delphia argues that widening Sperry Avenue is not feasible and suggests that the response to the *Draft EIR* does not address actual costs and identify actual funding mechanisms.

Response: The rebuttal restates and expresses opinions on issues raised in the previous comments. The *Draft Final EIR* identifies the lack of funding certainty as a potentially significant impact.

Comment: Mr. Delphia suggests that the Salado Avenue extension west of Ward will be a problematic intersection.



Response: The rebuttal restates and expresses opinions on issues raised in the previous comments. No response in addition to the previous response is required.

Comment: Mr. Delphia objects to the response that streets shown on the *Circulation Plan Diagram* are diagrammatic in nature, and suggests that the roadway shown in the vicinity of Salado Creek will act as a northern bypass.

Response: The rebuttal restates and expresses opinions on issues raised in the previous comments. No response in addition to the previous response is required.

Comment: Mr. Delphia questions the general alignment of the bypass and questions how the bypass will function if West Main is not also widened to four lanes. Mr. Delphia suggests that the EIR should the issue that the further south the bypass is located, the less functional it becomes, and suggests it will force more people on to Sperry Avenue and the new street located near Salado Creek.

Response: The rebuttal restates and expresses opinions on issues raised in the previous comments. While the location of the bypass is further south than in the *Draft General Plan*, the traffic analysis indicates that four lanes will still be required in that location. The *Draft Final EIR* indicates the traffic volumes for Sperry Avenue and the new street near Salado Creek. Expansion of West Main to four lanes is envisioned as part of the County's Capital Facilities Fee program.

Comment: Mr. Delphia again suggests that the circle will become a major route between Highway 33 and West Las Palmas.

Response: The rebuttal restates and expresses opinions on issues raised in the previous comments. No response in addition to the previous response is required.

Comment: Mr. Delphia questions the possible closure of F Street. If F Street remains open, Mr. Delphia suggests the need for a railroad signal on this street, and further suggests that traffic will travel from First Street to F Street and across Highway 33, and that the impacts of these travel movements were not addressed in the *EIR*.

Response: F Street does not cross the railroad. The comment is unclear regarding which portion of F Street is referred to and which portion is to be closed. No further response possible without speculation regarding the intent of the comment.

Comment: Mr. Delphia questions why 9th Street is not designated as a collector between Sperry Avenue and F Street. He suggests that the impact of traffic in front of Patterson High School and Patterson Junior High School should be analyzed, and comments that fatalities have occurred in front of a high school in Modesto. He suggests that Ward Avenue be left in place to reduce traffic in front of the schools.

Response: The rebuttal restates and expresses opinions on issues raised in the previous comments. In that respect no response in addition to the previous response is required. Regarding the assertion that 9th Street as a collector will be similar to

a situation in Modesto, the comment is false. The street in Modesto where student fatalities occurred near a high school is Sylvan Avenue which is a four-lane major arterial roadway carrying much more traffic than 9th Street is projected to ever carry. The circumstances of one of those accidents were that one student was hit while in a crosswalk crossing with the pedestrian signal by a vehicle which ran the light. In the other instance, a vehicle struck students during dense fog conditions. Neither had anything to do with the adjacent land use or type of the street, but instead primarily involved inappropriate human behavior by drivers, which is usually the case in vehicular accidents.

Comment: Mr. Delphia suggests that the costs of constructing bridges at Sperry and I-5 will be greater because of the seismic hazards in the area. Mr. Delphia also suggests that the potential for earthquakes is greater than is described in current studies.

Response: The rebuttal restates and expresses opinions on issues raised in the previous comments. In that respect no response in addition to the previous response is required. All structures will be built according to California seismic safety requirements.

Comment: Mr. Delphia suggests that the *EIR* does not address the flooding that has historically taken place west of Patterson on the Campbell Ranches and Kaufman & Broad property.

Response: The areas to which Mr. Delphia refers are not included within the 100-Year Floodplain, but are areas of localized flooding. Policies in the *General Plan* and the *Storm Drain Master Plan* provide for the development of storm drain facilities as new development occurs.

### Letter Summary

The letter included the comments of the County Environmental Review Committee.

Comment: The Environmental Review Committee felt that traffic impacts should be mitigated through County Public Facilities Fees.

Response: No response is necessary.

Comment: The Environmental Review Committee suggests that agricultural buffer zones be investigated to reduce the impact of potential drift from crop dusting.

Response: The City considered a wide range of agricultural protection measures during the Issues and Options phase of the *General Plan* program, including buffers, but rejected the use of buffers as not a feasible alternative.

Comment: The Environmental Review Committee noted that the potential for hazardous waste may exist in the area of the Patterson Airport.

Response: At the *General Plan* level, no investigations were conducted to identify specific areas where hazardous wastes might be found. These areas should be identified and mitigated at the project level. Policy VII.C.8 was included in the plan to provide for testing for contamination in areas suspected as potentially hazardous and to provide for their remediation prior to development.

Mike McNaughton  
Patterson Downtown Business Improvement Association

Letter dated March 5, 1992

### Letter Summary

The Downtown Business Improvement Association expresses concern over the preservation of the existing downtown, and supports the location of new commercial centers as closely as possible to the current downtown.

Response: Proximity of new and existing commercial areas is one of the primary urban design concepts in the *General Plan*. No response is necessary.



W.A. Carpenter  
Crows Landing NALF

Letter dated April 1, 1992

### Letter Summary

Lt. Commander Carpenter and NASA support the removal of the area south of Elfers Road in the *Final General Plan*.

Response: No response necessary.

Thomas Lynn Avery  
Administrator  
Del Puerto Hospital

Letter dated March 26, 1992

### Letter Summary

The Patterson Hospital District Board recommends adoption of the Medical Service section as presented in the *Draft Final EIR*.

Response: No response necessary.

Keith Daniel  
Superintendent  
Patterson Unified School District

Letter dated March 18, 1992

### Letter Summary

Dr. Daniel supports the language and analysis concerning schools in the *General Plan Policy Document* and *Draft Final EIR*.

Response: No change has been made in the policy language or *EIR* analysis. No response necessary.



Tom Van Groningen  
Chancellor  
Yosemite Community College District

Letter dated March 13, 1992

### Letter Summary

Mr. Van Gronigen suggests that the City consider reference to higher education in the *General Plan*.

Response: This comment does not address an environmental issue under CEQA, but rather addresses City policy. However, Policy IV.G.9 was added to the *General Plan* in response to this issue, as follows:

The City shall support the location of junior college and other higher education facilities in Patterson or western Stanislaus County.

David L. Jones  
Air Quality Planner  
Stanislaus County Department of Environmental Resources  
Air Pollution Control District

Letter dated April 8, 1992

### Letter Summary

Mr. Jones notes the commitment to minimizing air quality impacts and cooperating with the APCD in the General Plan. The comment supports existing policy language in the plan and the mitigation suggested in the *Draft Final EIR*. Mr. Jones also relates that the Unified Air Pollution Control District is working to develop a model Air Quality Element which includes specific policies and programs for inclusion in future updates of local general plans.

Response:                   The *EIR* identifies the following policy as mitigation measure which was included in the *General Plan* as Policy VI.D.7:

The City should review development projects using criteria established by the San Joaquin Unified APCD in order to minimize future increases in vehicle travel and to assist in implementing appropriate indirect source regulations adopted by the APCD.

Richard G. Gaiser  
Fire Chief  
City of Patterson

Letter dated March 13, 1992

### Letter Summary

Chief Gaiser makes several specific comments concerning both policy and statements for fire analysis.

Comment: Chief Gaiser suggests that locating a second fire station adjacent to a park would be desirable.

Response: The *Final EIR* discusses the need for a second fire station, and it is noted that location near a park would be advantageous.

Comment: Chief Gaiser notes that the intersection of Sycamore and Las Palmas was not included in the list of intersections to be signalized in the *Draft Final EIR*.

Response: This list was not intended to be all inclusive, since the exact locations where signals will be needed can not be foreseen with complete accuracy. The paragraph following the list on page IV-7 indicates that another 10 to 12 intersections may have to be signalized ultimately. The Sycamore and Las Palmas intersection might be one of them.

Comment: Costs for emergency vehicle control of intersection lights should be included in mitigations.

Response: Comment noted. Modern traffic signal design typically includes provisions for emergency vehicle preemption. The Fire Department and the Public Works Department should work cooperatively to identify the preemption system which is desired and the special provisions and specifications to be included in traffic signal construction contracts.

Comment: Chief Gaiser questions whether fire flow was considered in the statement in the *Draft Final EIR* that wells are currently operating at 50 percent capacity.

Response: The discussion in the section referred only to domestic use, and not fire reserve. The *Water Master Plan* provides for storage facilities in addition to source capacity to provide for adequate fire flows as new development occurs.

Comment: Chief Gaiser suggests that addition of policy language to provide for at least 50 percent of the City's well capacity equipped with standby power.

Response: The *Water System Master Plan*, which describes future water system capacity and distribution, suggests that at least two of the total six wells at buildout should be equipped with standby power.

Comment: Chief Gaiser opposes Policy I.F.3, which calls for a joint public safety facility with the police station.

- Response: This comment concerns the *Policy Document* and is not an issue regarding the environmental impact of the *General Plan*.
- Comment: Chief Gaiser recommended correction of the section describing the number of volunteer personnel in the West Stanislaus Fire District. He also suggests that the *EIR* analysis concerning the Fire Department should include a quantified ratio using 1.0 to 1.25 sworn full-time firefighters to 1,000 population in order to lay the foundation for full-time personnel if the need exists.
- Response: The section was revised in the *Final EIR* to correct the volunteer numbers and to reflect Chief Gaiser's suggested ratio, as a tool to predict the number of firefighters if Patterson were to rely on a fully paid firefighting force at buildout of the *General Plan*. It is unlikely that Patterson will rely on a fully paid or fully volunteer fire force over the next 20 years, but more likely a combination of volunteers and paid firefighters. Based on Policy I.F.1, the City will seek to maintain response times and ISO rating. If and when volunteer personnel are no longer able to achieve these service levels, it is assumed that paid personnel will be added.
- Comment: Chief Gaiser suggests that the goal of achieving an ISO rating of 5 should be increased.
- Response: The policy reads ISO rating of 5 *or better*.
- Comment: Chief Gaiser suggests that the use of development fees and annual benefits assessments for salaries and annual operation expenses are needed to mitigate the impacts for the fire department.
- Response: The City has an adopted facilities impact fee assessed on new development to pay for a variety of facilities, include fire. The *General Plan* provides for annual review and revisions of impact fees.
- Comment: Chief Gaiser suggests that the fire inspection program which is currently undertaken with one volunteer inspector will need additional personnel.
- Response: The *Final EIR* notes the need for additional fire personnel.
- Comment: Chief Gaiser comments that the Ward/Las Palmas/Sperry area is not an ideal location for a new fire station since a section of Ward Avenue is proposed to be removed, and suggests that alternate locations may be more feasible.
- Response: Comment noted. New fire stations can be located in alternate locations.
- Comment: Chief Gaiser suggests that fire personnel may not be available to staff the City's command center.
- Response: Comment noted. Staffing will be determined when the command center is developed.



Comment: Chief Gaiser suggests that the *EIR* should address the need for an additional fire station in order to minimize response times.

Response: The *Final EIR* fire section was expanded to include such a discussion.

Comment: Chief Gaiser suggests that the organizational relationship between the Patterson Fire Department and West Stanislaus Fire District should be analyzed for cost effectiveness.

Response: This issue concerns organizational structure and is not an environmental issue to be addressed under CEQA.

## Letter Summary

Mr. West makes several specific comments concerning policies in the *General Plan*. Most of Mr. West's comments concern policy decisions with which Mr. West disagrees. The responses deal primarily with the environmental consequences and adequacy of the *EIR* text.

Comment: Mr. West notes that the land uses in the western extension of downtown do not always follow parcel lines.

Response: As stated in the *General Plan*, in *most* cases the Land Use Diagram boundaries follow parcel lines. The primary exception to this is the area proposed for the western extension of downtown, where the parcelization pattern does not support the extension of the existing grid street pattern. The City selected this scheme in order to provide for an extended, vital, pedestrian-oriented downtown which builds upon Patterson's existing urban form.

Comment: Mr. West makes several comments in objection to the urban design, land use, and circulation pattern of the western extension of downtown onto property owned by Kaufman & Broad, and suggests that the City should add language to allow it to locate the civic center elsewhere, and allow for flexibility in the "plaza."

Response: Patterson's existing downtown pattern was described by citizens as Patterson's best feature to preserve and enhance. The grid street pattern with radial streets reflects a modification of the existing urban form in downtown Patterson. Grid streets are found in cities throughout California and have been demonstrated as both buildable, safe, and a desirable urban form. The diagonal alignment of streets within the developing area west of the existing downtown has been used sparingly. Care has been avoided almost all of the disadvantages of the diagonal alignments in the existing part of town, while still maintaining the flavor of Patterson's radial extensions of some roadways out from the civic center. No intersections are envisioned which have more than four legs, thus preventing a repeat of the traditional star burst intersections. Very few intersections will even have intersecting angles which are noticeably different from 90 degrees. These design features will promote much safer conditions than the traditional diagonal layout provides. The basic concept is clearly acceptable, practical, and buildable, as evidenced by the fact that it exists in Patterson already. The location of the civic center/plaza area is a policy decision, and through its designation as Public/Quasi-Public, could allow for a variety of uses.

Comment: The City should consider flexibility concerning the closure of Ward Avenue.

Response: The *Draft Policy Document* included two circulation concepts: with and without the section of Ward Avenue. After public review, the City selected the alternative which provides for the abandonment of that section of Ward Avenue in order to

facilitate the extension of the existing street pattern and link new commercial development to the existing downtown.

Comment: Mr. West makes several comments concerning Housing Element policies, programs, and numbers. He supports the use of secondary residential units, opposes the use of inclusionary zoning, citing it as legally challengeable, and suggests revisions to the SAAG regional fair share numbers and Housing Element time frame.

Response: Inclusionary zoning is used in many cities in California as a means of providing for lower-income housing. The SAAG Regional Fair Share figures and Housing Element time frame are those mandated by state law.

Comment: Mr. West suggests that City consider a second sewer plant (package plant) on the west side, suggesting it would be less expensive.

Response: This is a policy issue. In the *Sewer System Master Plan*, the City has planned a system for all development to be linked into the City's sewage treatment system and not to allow new septic tanks and package treatment plants.

Comment: Mr. West suggests that the *General Plan* includes too much commercially-designated land, describing it as 224 acres, and the equivalent of 2 to 4 major shopping malls.

Response: In Table II-2, the table to which Mr. West refers, the commercial acreage is divided by land use designation. Of the 224 acres cited by Mr. West, only 73 acres are designated for retail commercial, those uses typically associated with shopping malls. This is a reasonable ratio to serve the population of the *General Plan* at buildout. Another 42 acres are designated for General Commercial uses (e.g., auto dealerships, lumberyards). This is also a reasonable ratio for future growth. Finally, 109 acres near Interstate 5 is designated for Highway Commercial uses (e.g., hotels, restaurants, regional commercial uses.) This land use takes advantage of Patterson's location and potential for attracting highway travelers. In addition, as noted in the *EIR*, full buildout of all land within the Planning Area is not likely to occur within the time frame of the *General Plan*; surplus land provides the market with some locational choices.

Comment: Mr. West comments that the County's Agricultural Element is still in draft form but is undergoing review, and suggests the discussion be updated when the Agricultural Element is adopted by the County.

Response: The Agricultural Element was adopted by the County in April 1992; references were updated in the *Background Report* and *Policy Document*.

Comment: Mr. West objects to a four-lane roadway through the Kaufman & Broad property and suggests it be reduced to two lanes.



- Response: The need for four lanes is based on the projected traffic volume levels which such a facility will carry. Based on the best information available about what the future traffic volumes levels are likely to be, a four-lane facility seems clearly warranted. To plan for only a two-lane facility would in fact be inviting congestion and safety problems in the future with the level of traffic expected. With proper design of the roadways and the neighborhood enclaves, any potential traffic safety or noise problems can be avoided.
- Comment: Mr. West suggests that future traffic conditions are based on very unlikely assumptions regarding buildout of the entire Planning Area.
- Response: On page IV-4 of the *EIR*, the potential imbalance in the projected land use development within the Planning Area is identified. To the extent that actual development patterns differ from those assumed in the *EIR*, some changes in the circulation system requirements may be appropriate in the future. For now, however, the *EIR* and the planning process necessarily considers the entire potential for needed infrastructure needs based on the *Land Use Diagram*. This is a prudent and appropriate worst case analysis, and consistent with the requirements of CEQA.
- Comment: Mr. West objects to Policy IV.G.6, concerning mitigation of schools, as premature and not clearly legal.
- Response: The policy is clearly not premature as recent development has impacted school facilities. There are no clear legal standards statewide concerning what are acceptable policies and requirements for school impact mitigations. The policy as written will be implemented based on the authority of state law and legal advice from the City's legal counsel.
- Comment: Mr. West suggests that the solid waste projections do not reflect the City's recycling goal of a 50 percent reduction.
- Response: Table V-6 on page V-24 calculates solid waste generation at buildout using existing generation rates. Under the "Impacts" section on page V-25, however, the discussion of a 50 percent reduction based on the City's recycling goals is included.
- Comment: Mr. West comments that the City's parkland standard of 5 acres per 1,000 population be reduced to 3 acres per 1,000 population, per the Quimby Act.
- Response: The Quimby Act dictated parkland dedicated under the Subdivision Map Act, and does not govern General Plans. The City chose as policy to select a higher standard in its *General Plan*, which it can work to achieve through various means.
- Comment: Mr. West questions who has observed kit fox denning in orchards in the Central Valley, and suggests that this language be omitted.



Response:

Questions concerning the viability of agricultural areas as kit fox habitat have been raised. Sightings of kit foxes in agricultural areas have been made by farmers, residents, and others. This language should not be removed from the *EIR* as it responds to previous comments on the *Draft EIR* and is an issue of statewide and citywide concern.

Comment:

Mr. West notes that the noise contours do not reflect the four-lane roadway through the Kaufman & Broad property.

Response:

This was a drafting oversight. It was corrected in the *Final EIR*.

Keith Barrett, Chief  
Division of Operations and Maintenance  
California Department of Water Resources

Letter dated March 9, 1992

### Letter Summary

Mr. Barrett references the comments by the Department on the Patterson Gateway General Plan Amendment Draft EIR, for a project proposed within Patterson's Planning Area in unincorporated Stanislaus County. The attached comments on the project state that the Department has no adverse comments relative to the environmental impact of the project, but will address technical concerns as part of their review of the encroachment permit for the project.

Response: Mr. Barrett has no negative comments on the *General Plan* nor the proposed project. No response is necessary.



U.C. BERKELEY LIBRARIES



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BASE MAP PREPARED BY LEW-GARCIA-DAVIS - SEPTEMBER, 1990

N

# City of Patterson

## GENERAL PLAN LAND USE DIAGRAM

- RESIDENTIAL**

LR

Low Density Residential

DR

Downtown Residential

MR

Medium Density Residential

HR

High Density Residential
- COMMERCIAL/OFFICE**

NC

Neighborhood Commercial

DC

Downtown Core

GC

General Commercial

HSC

Highway Service Commercial

MPO

Medical/Professional Office
- INDUSTRIAL**

LI

Light Industrial

HI

Heavy Industrial
- OTHER**

PQP

Public/Quasi-Public

PR

Parks/Recreation

AG

Agriculture
- RESERVE**

RR

Residential Reserve
- Planning Area Boundary

Adopted June 11, 1992  
Amended:



